

# Data protection and anonymity considerations for equality research and data

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## Introduction

The General Data Protection Regulation (GDPR), which came into effect on 25 May 2018, is a regulation by which the European Parliament, the Council of the European Union and the European Commission intend to strengthen and unify data protection for individuals within the European Union (EU). Regardless of the UK's 2016 vote to leave the EU, the GDPR currently applies in the UK, and the UK Government will continue to apply its provisions through a new Data Protection Act passed on 23 May 2018. This Act replaces the Data Protection Act 1998 and aims to protect all EU citizens from privacy and data breaches.

The GDPR enhances the rights of 'data subjects' (individuals to whom personal data pertain) and provides clear conditions for collecting, storing, processing and transferring personal data (including 'special categories' data) by institutions. It is advisable to become familiar with the principles outlined in Article 5 of the GDPR, which address the following:

- + Accountability
- + Lawfulness, fairness and transparency
- + Purpose limitation
- + Data minimisation
- + Accuracy
- + Storage limitation
- + Integrity and confidentiality.

Please see the resources at the end of this briefing.

The GDPR is applicable to data processing. This includes data collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

The following briefing provides guidance on the implications of the GDPR for equality and diversity research. It will cover:

- + Collecting data
- + Equality monitoring data
- + Primary research data
- + Storing data
- + Anonymising data

The briefing does not cover all aspects of the GDPR and does not constitute legal advice.

## Collecting equality monitoring data

The GDPR only applies to 'personal data', which is data that is not anonymised. Equality monitoring information is considered 'personal data' in both the previous and new data protection legislative frameworks, so long as the person or institution collecting the data knows the identity of the person to whom the data pertain. It is personal data in the sense that it relates to an identified or identifiable natural person (a person who can be identified by reference to identifying information, which can include protected characteristics).

Equality data that is anonymised is by its nature not able to identify the individuals to which it pertains. Anonymised data is therefore not personal data, and so is not covered by the GDPR. However, care must be taken that this data is not able to identify individuals with reference to any other information. Please see more on this below in the section on anonymising data.

Institutions might consider whether, and under what circumstances, it would be appropriate for them to collect equality data anonymously (so that this is not linked to the person's name). This could be done through an anonymous survey for example, or a system wherein individuals are tied to an identifying number, but where a key that would link these numbers back to individuals is not stored.

Provided that you know the identity of the person from whom you are collecting data, the GDPR has implications for the information which you provide to individuals at the point of collection of equality data. Specifically, you must provide:

- + Information about your organisation: including name and contact details, details of your representative (if relevant) and contact details of your Data Protection Officer.
- + Information about the type of data you will collect: for example, name, address, employer, job title, etc.

- + The purpose of collecting the data: including what you will use it for and whether it will be used to make an automated decision; the legal basis for using the data including any 'legitimate interest' relied upon; and what categories of people will receive or have access to the data (eg Advance HE, in relation to data that will be used in equality charter applications).
- + Other information: including whether the data will be transferred, stored, or processed outside the EU and on what basis; how long the data will be stored for; what security arrangements are in place to protect the data; whether provision of the data is required and the consequences of not doing so. If you are considering transferring a large volume of data it is advised to complete a Data Protection Impact Assessment.
- + Data subjects' rights: the right to be informed; right of access; right to rectification; right to erasure; right to restrict processing; right to data portability; right to object; and rights in relation to automated decision making and profile.
- + Contact information: who they can contact in relation to questions or complaints.

It is important to provide a means for individuals to give consent to your processing of their information after they have read the above information (eg through a tick box or series of tick boxes on a paper form, or an electronic one). A key change with the GDPR is that this consent has to be a freely given, specific, informed and unambiguous indication of a person's wishes: this tick box cannot be pre-filled as 'opted in'. This is distinct from passive consent, wherein a person is assumed to have given consent unless they actively opt out or object.

Some categories of equality data are further protected in the GDPR (ie they are considered more sensitive than a name or address, and thus subject to further protection). These data are also referred to as 'special category' data.

The equality data which is subject to further protection includes:

- + Some categories of impairment within disability status
- + Race/ethnicity
- + Gender reassignment
- + Religion and belief
- + Sexual orientation.

Note that data collected on marriage and civil partnership may have implications for data on sexual orientation, in that the current legal framework data on civil partnership will indicate sexual orientation. Therefore it is recommended that data on marriage and civil partnership also be treated as special category data. Note that this is generally consistent with the previous data protection framework.

## Legal basis of equality data collection

For non-special category data, it is advisable that institutions rely on consent as the legal basis for collecting and processing equality data. This means it is important to provide the above information and to have a facility for individuals to give consent for you to collect their data.

For special category data, in addition to consent, you need an additional legal basis upon which to collect these data.

One of these is explicit consent. According to the Information Commissioner, explicit consent is not very different to the consent described above. It 'must be expressly confirmed in words, rather than by any other positive action.' It is advisable to rely on this basis. If relying on this basis follow the good practice on obtaining consent contained in this briefing.

There are also provisions that special category data can be processed for monitoring of equality of opportunity, or for research purposes without explicit consent being given. However, this still relies on consent to give the data in the first instance being freely given at the point of data collection. If the data were to be collected anonymously, so that the collecting institution did not know the identity of the individual, it would be possible to rely on these bases to process the data, including by third parties.

A change with GDPR is that institutions relying on monitoring of equality of opportunity as the basis for processing special category data are required to have policies on safeguarding the information and on retention and erasure of the information.

Below is a sample data collection statement that you might adapt when collecting equality data. This information may also be covered in your institution's updated privacy policy to coincide with GDPR.

## Example data collection statement

[Institution] aims to have an inclusive environment for all staff and students, by identifying and removing barriers in our practices. Providing this equality data will help us achieve this, and also help [institution] meet our obligations under the Equality Act 2010. You will be asked about your age; disability status; ethnicity; gender identity; pregnancy and maternity; religion or belief; sex; sexual orientation; marriage or civil partnership; and caring responsibilities (some of these data are 'special category data' in GDPR).

While it is voluntary to disclose this information and relies on your consent to do so, this information will enable us to better understand the composition of our workforce/ student body and examine our practices fully to better support staff and students.

Your answers will be treated in the strictest confidence, and all data disclosed will comply with the Data Protection Act 2018. [Insert statement about institution's privacy policy]. Within the institution those who will have access to this data include [insert job roles of people with access to the data]. Your anonymised data may be shared with Advance HE for the purposes of equality charters. [Insert information about where and how the data will be stored, and how long it will be stored for]

To find out more about the work [institution] is doing to meet the requirements of the Equality Act, please contact [name] or visit [website link].

To find out more about how your data are protected, please contact [Data Protection Officer]. If you have a question or to make a complaint, please contact [name and contact details].

Please note that you have the following rights in relation to your data: to be informed about the processing of your data; to access your data; to rectify inaccurate or incomplete data; to request erasure; to request processing restrictions; to obtain and reuse your data.

Please indicate your consent to provide these data for use for the purposes described above:

- I have been informed about the purpose of providing my equality data, including special category data, and consent to its processing for the purposes described above.

It is advisable to test your data collection statement with a range of users. [Further guidance is available from the Information Commissioner's Office.](#)

## Collecting primary research data

It is important to distinguish, and also to identify overlaps, between personal data (which identifies individuals, including name, address, etc), and research data (qualitative or quantitative data that will be analysed to answer research questions, such as perceptions of fairness in the staff or student life cycles). What constitutes 'research data' will vary depending on the research project.

Personal data and research data can overlap because personal data is often collected alongside research data (eg signed consent forms), or when research data includes personal data that can identify individuals (eg if research data includes equality characteristics). As mentioned above, the GDPR only pertains to personal data.

It is advisable to consider at the outset of a research project whether it is necessary to collect personal data (ie names and contact details) and to only collect the personal data which is deemed essential for that particular project.

Although it strengthens protections, the GDPR actually introduces only a few changes for what was already considered good practice in collecting data during primary research (interviews, focus groups and surveys). The key is that research participants provide their specific, voluntary, informed and unambiguous consent to provide data to the research.

One change pertains to personal data collected along with research data. Under the GDPR, participants have an indefinite right to withdraw consent for processing of their personal data. This need not impact research data if it is anonymised, but it is important to provide participants with the option to withdraw consent for processing of their personal data, if it is to be stored along with research data. Either way, it is recommended that personal data be stored separately from research data in projects where

participant data is anonymised. You may still wish to limit participants' ability to withdraw consent for use of their research data (for instance, after it has been analysed) by specifying a cut-off date (this applies so long as the research data cannot identify the individual).

Although the GDPR provides some exemptions for processing personal data for research purposes, it is good practice in light of research ethics to rely on explicit consent as the legal basis for processing data for research purposes. The GDPR contains a basis for processing special category data for research purposes, but if relying on this basis it is important to note that data subjects have the right to object. The GDPR also contains exemptions for storing and processing data for different research purposes than those given at the point of data collection, but these should be used with caution and after seeking legal advice.

Researchers using automated processes to profile individuals based on their personal data will need to conduct a privacy impact assessment. [More information on privacy impact assessments can be found on the Information Commissioner's Office website.](#)

Below is further guidance for obtaining informed consent, through the provision of an information sheet and the use of a consent form.

The template provided below can be adapted for use as a hard copy form for interviews and focus groups. It can also be adapted as the introduction to a survey, whether in print or online. It is specifically designed for research in which data is anonymised.

A copy of your institution's privacy policy should be provided to research participants alongside the information sheet and consent form.

## Participant information sheet and consent form template

[Insert title of project]

### Purpose of the research

Clearly state the purpose of the research, including:

- + Target audience
- + The research questions you are seeking to answer
- + The type of research method (eg interview, survey)
- + Who is conducting the research, including information about the organisation and how the research is funded
- + Information about any third party who will have access to the data under contract (ie a research consultant), and information about the consultant organisation's privacy policy.

### Confidentiality of research participants

All personal data and information that participants share in [insert research intervention] will be held confidentially by [institution] in accordance with the requirements of the General Data Protection Regulation (GDPR) and Data Protection Act 2018. At no point will the information provided be shared in a way that would allow participants to be personally identified. Any quotes in a resulting report will be anonymised. [State whether any recording will be made to aid accuracy, eg audio, and how long these records will be retained for].

- + all information about participants will be handled confidentially by the researchers
- + participants will not be personally identified in any report arising from the research
- + participation is voluntary.

Participants are free to leave the [research intervention] at any time without any negative consequence.

State whether, if participants stop their participation, their contributions may still be used (eg if a participant partially completes a survey, or leaves a focus group before it has concluded). For instance, in a survey you could state:

*'While we hope that you answer the survey in full, you are free to stop answering questions at any point. Be aware, however, that the online survey platform submits data at the end of each section, so we may use your data even if you do not reach the end of the survey.'*

## Benefits and risks of participating

Provide information as to any benefits to participants, and any potential risks.

Benefits may include:

- + Receipt of the research findings
- + Any use of the findings which participants might have.

Potential risks may include:

- + Raising of sensitive topics concerning inequality, which may cause a negative emotional reaction.

It is important to signpost to appropriate support in the case of risks arising, and to know which support you would signpost to before commencing with data collection.

## Research ethics and storing data

Provide information about how the data will be stored securely, including personal and special category data, eg:

[Institution] has robust research ethics and data storage policies, copies of which are available to participants on request. All personal and/or special category data are held securely in accordance with the institution's Privacy Policy.

[Insert organisational privacy policy]

This should include:

- + Name of the Data Protection Officer
- + Information about who will have access to the personal data, and whether it will be transferred outside of the EU
- + Information about the rights of the participant to access, rectify, and remove their personal data
- + Information about complaints procedures with the [Information Commissioner's Office](#)
- + How long the personal data will be stored for, and for what purpose.

## Contact

Provide contact details of the researcher for any questions on the above information.



## Complaints

Complaints about the conduct of the institution's research after it has concluded should be directed in the first instance to:

[Insert contact details]

## Consent form

Project title: [Insert project title]

Researcher(s): [Researcher name, researcher email, researcher telephone]

Named organisation: [Name and address]

Thank you for your interest in taking part in this research. Before you agree to take part, please read the participant information sheet that explains the project to you. If you have any questions arising from the information sheet or explanation already given to you, please ask the researcher before you decide whether to participate. You will be given a copy of this consent form to keep and refer to at any time.

Participant's statement:

I agree that (please tick):

- I have read the participant information sheet and understand the purpose of the research.
- I understand that if I decide to no longer take part in this research I can leave the [research intervention] at any time.
- I understand that should I wish to withdraw my contribution I can contact [insert appropriate contact, typically the researcher, and the withdrawal procedure, ie if participants are able to withdraw at any time or if there is a cut-off date for withdrawing their research data], without having to state a reason.
- I understand that my personal information will be processed only for the purposes of this research. I understand that such information will be treated as strictly confidential and handled in accordance with the provisions of the General Data Protection Regulation (GDPR) and UK Data Protection Act 2018.
- I understand that the information I share, including anonymised direct quotes, may be included in any resulting report. [Remove as necessary].
- I understand that my participation will be audio recorded for accuracy. [Remove as necessary].

- I understand that the information I provide will be shared with [list the names of any third parties that may temporarily have access to the data, such as a transcription company that will have access to audio recordings]. [Remove as necessary].
- I understand that the information I provide will be retained for [insert time frame from your retention policy] and destroyed [insert when, eg six months after the project is completed].
- [As applicable, insert a statement about whether the participants will be able to access or modify the research data that they contribute, eg receipt of interim findings.]
- I agree that the project named above has been explained to me to my satisfaction and I agree to take part in this research.
- I have read and understood the institution's Privacy Statement and consent to the researchers processing my personal data accordingly.

Name:

Date:

It is important to retain records of consent to participate in the research for as long as the research data are retained. It is recommended that hard copy forms be scanned and stored securely, ie encrypted and stored on a restricted drive.

## Storing data

If it is deemed necessary to collect personal data, it is essential that in projects where research data are anonymised, that personal data is stored separately from research data. This includes signed consent forms.

It is advisable to develop a retention schedule for personal data. It is important that both personal and research data are stored securely, and that only those who require access are able to access it.

It is important to keep records of how personal data are used for as long as the personal data are stored.

For further guidance on processing and storing research data, please see [Advance HE's briefing on ethics in primary research](#).

### Location of stored data

Particularly under the GDPR, it is good practice to store personal and/or research data within the UK/EU. This may have implications for research services (eg online survey platforms, emailing services, transcription services) as some platforms or services store data outside of the UK/EU. Even when stored within the UK/EU, it is advisable to institute a non-disclosure agreement with the service. When sharing personal and/or research data, you are also responsible for ensuring that the third party organisation is GDPR compliant.

If you decide to use a service wherein data is stored outside of the UK/EU, you will need to have a strong basis on which this can be justified, and to provide information about the organisation's GDPR compliance and whether it is party to other data protection agreements (eg EU-US privacy shield).

When using any research service, whether in the UK/EU or not, it is important to use secure passwords for these accounts that are changed on a regular basis. Similarly, it is imperative that all data are deleted from the accounts after they have been processed by the service.

## Anonymising data

Anonymity means that a person participating in the research cannot be identified from the information provided. This is distinct from confidentiality, which is when the researcher or data collector knows the identity of the person, but keeps this information secure, and anonymises data before being published. [For more on this distinction see Advance HE's briefing on ethics in primary research](#).

Anonymisation can be a complex process in reporting results of any research or data collection project. At a basic level this involves removing names and other identifying information from the data which you are sharing. However, you need to also consider whether the person to whom the data pertains might still be identified through indirect identifiers (eg occupation, salary); by people who know them or the context; or by those who have access to other information which, when combined with the data, might allow them to be identified. In these cases, it is necessary to take further action beyond removing names to anonymise the data.

The GDPR contains a strict definition of anonymity: it considers data anonymous only when it cannot be identified by any means "reasonably likely to be used ... either by the controller or by another person". This means that if the data could be re-identified by any person using 'reasonable effort', it would not be considered to be anonymised.

## Anonymising quantitative data

To effectively anonymise quantitative data you need to consider whether individuals might be identifiable through a process of numeric elimination. For instance, if a department had only one BME professor it would be inappropriate to publish data about that person alongside an ethnicity identifier if they had been assured of anonymity, as it would be possible to identify the individual.

Advance HE recommends that the [Higher Education Statistics Agency \(HESA\) rounding and suppression methodology](#) be applied to quantitative data to effectively anonymise it, particularly where there is a risk that due to small numbers individuals may be identified by the data, or by the data alongside other accessible information.

There are three aspects to HESA's rounding methodology:

- + Counts of people are rounded to the nearest multiple of 5. This means that if a count is less than 2.5 it would be rounded to 0.
- + Percentages are not published if they are based on a total population that is fewer than 22.5 individuals. This is applicable to percentage change calculations where either the old or new number is less than 22.5.
- + Averages are not published if they are based on a population of 7 or fewer individuals.
- + When there are few participants, anonymisation can also involve creating groupings from certain variables. For example, if you have collected data on participants' exact age in years, you could group participants into 5-year or 10-year age bands to decrease the likelihood of them being identified.
- + Sharing anonymised quantitative data
- + If data are collected anonymously, so the person collecting the data does not know the identity of the person to whom the data pertain, there are no restrictions on sharing these data.

+ For the purposes of the equality charters, data may not be effectively anonymised at the point that it is shared with Advance HE. For this reason, and also because the institution collecting the data will usually know the identity of the person to whom the data pertain, a key implication is the need to explain to those providing data at the point of data collection that their data will be shared with Advance HE, and to gain their explicit consent for doing so. [Further guidance on the equality charters and GDPR is available on the Advance HE website.](#)

+ Submissions should be further anonymised when they are published. More guidance on this is below.

## Anonymising qualitative data

It is important to consider what, if any, confidentiality and anonymity is being offered to research participants at an early stage of the research process, and to design research instruments, participant information sheets and consent forms with this in mind.

Note that not all research projects keep participants' identities anonymous, and in some projects, participants may prefer to be identified. In these cases, it is important researchers respect participant preferences, while also balancing these with the wishes of other participants, and any potential harm to participants that may come from being identified.

Moreover, even where anonymity may be preferred, it is not always possible for researchers to effectively anonymise participants. This may be the case in research undertaken with staff in a single, small department, for example. In these cases, it is important that the researcher is clear with participants at the time of seeking consent that should they freely choose to participate, it is possible they might be able to be identified from the research results.

Effectively anonymising qualitative data is context-dependent. Beyond removing names and other identifying information from the data, to effectively anonymise you might consider changing details about the individual (eg gender), but only where this information is not directly relevant to the point being made. Note that while changing details may be appropriate in some qualitative research, this is not the case in quantitative research. In some sensitive research projects, researchers take care that participants are not even able to identify themselves in the research results through changing such details. It is important to balance the need to anonymise without potentially changing the meaning of the research results significantly.

### **Example: anonymising equality charter submissions before publishing**

Applicants that receive awards are encouraged to publish their submissions on their own websites and to inform Advance HE of the associated web address. However, it is important that any personal or confidential information about individuals is removed from the submission prior to doing this.

To understand how to effectively anonymise both quantitative and qualitative data, we recommend following the steps below before publishing an equality charter submission.

First, round and suppress all quantitative data using the HESA rounding methodology described above.

For qualitative data, follow the steps below.

### ***Identifying personal or confidential information in Athena SWAN Equality charter submissions***

Personal or confidential information in Athena SWAN submissions could include:

- + Names or initials of individuals.  
The names and positions of staff and students in your institution/department will not necessarily need to be removed, if this information is already in the public domain (ie on your institution's or department's website with the individual's consent).
- + Photos of individuals.  
Advance HE recommends seeking written consent of people depicted in photographs before publishing submissions. This protection has been further strengthened under GDPR.
- + Information about self-assessment team (SAT) members.
- + Case studies about individuals in Silver and Gold level applications.  
Case studies and biographical information about SAT members may contain sensitive or confidential personal information that is not appropriate to publish. Advance HE recommends removing such information about SAT members, and all case studies, from submissions before they are published. In cases where it is felt important to publish the case study, this may be anonymised. Guidance on how to do this is below.

### ***Guiding questions for identifying personal or confidential information:***

- + Is this information already in the public domain with the consent of the individual?
- + Is the information linked to individuals about their private life, or their working life?
- + Is it reasonably likely that an individual can be identified from the information?

- + Is it reasonably likely that an individual can be identified from the information contained in the submission, when cross-referenced with information in the public domain (ie the institution's or department's website)?

If information is about an individual's private life, it should not be published.

If information is not in the public domain, and can be used to identify individuals either on its own or in combination with other information that is available, it should be removed or anonymised before being published, or written consent should be obtained.

As mentioned above, GDPR grants individuals the right to change their mind and request that their information be removed at a later date. Similarly, although individuals may consent to their information being submitted in support of an application, they may not be aware of plans to publish it online if it was successful.

## **Examples**

### *Example 1*

Information on the work-life balance experience of a SAT member contains information about their private (home) lives.

The information on their work-life balance experience is removed before publishing, but other information provided by the SAT member is retained.

### *Example 2*

The Head of Department's letter of endorsement contains information about their private life.

If the name of the Head of Department were to be removed from the submission, they would still be identifiable through information on the department's website about who the Head of Department is.

The paragraph in the letter of endorsement containing confidential information is removed before publishing, rather than the name of the individual.

### *Example 3*

Section 3 of the application, 'THE SELF-ASSESSMENT PROCESS', contains the names and job titles of staff in the department.

These are all available on the department's website and as such do not need to be removed. However, it also includes the name and position of a first year postgraduate research student which is not in the public domain so written consent is obtained from the student before publishing.

### *Example 4*

The Action Plan identifies the job titles of those responsible for each action.

This information could be used to identify the individual when cross-referenced with the department's website, but this information pertains to their working life and is not confidential, so it is not removed.

### *Example 5*

The submission contains photos of staff and students in the department. These photos are not already in the public domain.

Written consent is obtained from all individuals in the photographs before the submission is published. Where consent is not granted in relation to one photo, that photo is removed before publishing.

## ***How can I remove information?***

Information can be deleted from copies of word documents or other editable documents before being published.

Note that for the institution's/department's own records, the original submission should be left intact, and saved securely so that access to it is restricted to those who need it.

If your submission is only in a non-editable format (eg, a non-editable PDF), you can print a copy, 'redact' (strike through with black marker pen, white cover up tape or white correction fluid) any personal or confidential information so it is not readable, and re-scan the submission. Alternatively, you can export a PDF into a word document by using Adobe Acrobat or Adobe Acrobat DC, for example.

This should also be done to previous submissions that may not have been redacted before being published.

### ***How can I anonymise information?***

If you feel that certain information is important to publish, eg in case studies, you may consider using a pseudonym and ensuring any other information that could be used to identify the individual (for example their job title, specific subject area or research interests) is removed.

### ***Example (non-anonymised)***

Sarah Smith joined the department as a Research Assistant in 1991. She gained a Marie Curie fellowship in the same year that she became pregnant with her first child. With the support of her Head of Department she negotiated a return to work part-time (0.6FTE) and was able to balance her part-time working hours with building her research profile. One important aspect of this was departmental support of flexible working hours to accommodate travel to national and international conferences.

### ***Example (anonymised)***

Jane Doe first joined the department as a Research Assistant. She gained a fellowship in the same year that she became pregnant with her first child. With the support of her Head of Department she negotiated a return to work part-time and was able to balance her part-time working hours with building her research profile. One important aspect of this was departmental support of flexible working hours to accommodate travel to national and international conferences.

Note that the above example would only be considered as anonymised if there were multiple people in the department to whom the above might apply.

### ***Checklist for anonymising Athena SWAN submissions***

- + Have I identified the personal and confidential information in the submission?
- + Have I removed or redacted all information pertaining to people's private lives, rather than their working lives?
- + Have I removed, rounded or redacted all special category data?
- + Have I removed or redacted names and initials of people that are not already in the public domain?
  - If not, have I obtained written consent of individuals that can be identified?
- + Where applicable, have I redacted or removed case studies from the submission?
  - If not, has the case study been anonymised and a pseudonym applied, so that the individual that the case study is about cannot be identified?
- + If the photo is not already in the public domain, do I have written consent from all people appearing in photographs in the submission?

## Further resources

*Advance HE* (2018) FAQ on Data Protection for Charter Applicants

[www.ecu.ac.uk/wp-content/uploads/2018/03/FAQ-on-Data-Protection-for-Charter-Applicants.pdf](http://www.ecu.ac.uk/wp-content/uploads/2018/03/FAQ-on-Data-Protection-for-Charter-Applicants.pdf)

*Advance HE* (2017) Ethics in primary research (focus groups, interviews and surveys)

[www.ecu.ac.uk/publications/ethics-in-primary-research-focus-groups-interviews-and-surveys/](http://www.ecu.ac.uk/publications/ethics-in-primary-research-focus-groups-interviews-and-surveys/)

*Information Commissioner's Office* (2017) An introduction to the Data Protection Bill

[ico.org.uk/media/for-organisations/documents/2258303/ico-introduction-to-the-data-protection-bill.pdf](http://ico.org.uk/media/for-organisations/documents/2258303/ico-introduction-to-the-data-protection-bill.pdf)

*UK Data Service* Guidance on anonymisation

[www.ukdataservice.ac.uk/manage-data/legal-ethical/anonymisation](http://www.ukdataservice.ac.uk/manage-data/legal-ethical/anonymisation)

*UK Data Service* Guidance on managing data

[www.ukdataservice.ac.uk/manage-data](http://www.ukdataservice.ac.uk/manage-data)

*XpertHR* Will employers be able to gather and analyse information for equality monitoring purposes under the GDPR?

[www.xperthr.co.uk/faq/will-employers-be-able-to-gather-and-analyse-information-for-equality-monitoring-purposes-under-the-gdpr/162844](http://www.xperthr.co.uk/faq/will-employers-be-able-to-gather-and-analyse-information-for-equality-monitoring-purposes-under-the-gdpr/162844)





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Advance HE was formed in March 2018, following the merger of the Equality Challenge Unit, the Higher Education Academy and the Leadership Foundation for Higher Education.

Our purpose is to advance the professional practice of higher education to improve outcomes for the benefit of students, staff and society. Advance HE has been created to be “of and for the sector” and is jointly owned by GuildHE and Universities UK.

We are driven by the strategic needs of higher education. Through our passion for excellence we aim to create an inclusive culture that champions the continuous development of teaching, leadership and research. We use an evidence-based approach to identify what works, and develop practice-based solutions.

Our vision is that the world-class reputation and standing of higher education is enhanced and recognised for transforming lives, enriching society and developing the economy for the better.

[www.advance-he.ac.uk](http://www.advance-he.ac.uk)