

2024 NSE Privacy Statement

Landelijk Centrum Studiekeuze (LCSK), located at Arthur van Schendelstraat 600, 3511 MJ Utrecht (The Netherlands), is responsible for the processing of personal data as shown in this privacy statement.

The LCSK foundation is funded by the Dutch Ministry of Education, Culture and Science. The foundation has been tasked with executing article 7.15a of the Higher Education and Scientific Research Act (WHW): “Our Minister designates a legal entity whose task in the field of higher education it is to collect and distribute, free of charge, objective, reliable and comparable information on education choices and to conduct research into student satisfaction and involvement.”

LCSK will, in line with this legal article, perform the National Student Survey (NSE) annually. Prospective students can use this information to compare course programmes at universities and universities of applied sciences. The 2024 NSE is implemented under the responsibility of LCSK and is carried out by research agency MWM2. MWM2 is the data processing party. They process the personal data on behalf of LCSK. The data is processed and stored in the Netherlands and Germany.

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Relevant personal data

LCSK processes the personal data of students at universities and universities of applied sciences who are entered into an accredited associate degree, bachelor or master programme. Publicly funded institutes of higher education and private institutes that wish to participate will provide LCSK with the following information on the basis of a statutory regulation (Regeling levering studentgegevens):

1. the student’s email address;
2. the relevant institute’s BRIN number;
3. the relevant institute’s BRIN serial number;
4. the student’s preferred language;
5. the course programme’s CROHO code;
6. the name of the student’s course programme variant, learning route or track;
7. the programme form (full-time, part-time, dual work-study);
8. the physical location of the institute (registered office);
9. whether the student is a regular, post-master or pre-master student;
10. whether the student is enrolled in an originally remote-learning programme;
11. whether the student is a first-year student;
12. whether the student is studying at a university or university of applied sciences.

Institutes can, in the above list, provide the name of the course variant, learning route or track as an additional option.

Institutes of higher education that are polling the “art education” block of questions must also have the column “art programme” completed, in addition to the “main programme” column.

For the purpose of the research, institutes of higher education that are polling the “International students” block of questions must also have the column “International students” completed with either “yes” or “no”. The institution determines which of its students it designates as international students. As this piece of information is not covered by the above-mentioned statutory regulation, institutes of higher education themselves are responsible for the legal basis for processing the information.

Institutes of higher education can additionally supply seven labels for characteristics that they want to be analysed for student satisfaction. These labels cannot contain information that can be traced back to an individual, meaning they cannot consist of an email address, name or student ID. Optionally, the institute of higher education can provide a second email address to be used for the NSE invitation message. The institute is responsible for the legal basis of this additional data submission.

LCSK processes the personal data for the following purposes:

- Inviting students to complete the NSE;
- Processing the survey data into NSE results;
- Informing participating students about the NSE results;
- Giving out prizes to randomly selected students for participating in the NSE.

The responses to the NSE survey are processed based on consent.

As a starting point, LCSK processes the results from the NSE into anonymised data files. These data files are used for:

- Supporting information for prospective students, by comparing scores on course programmes at different universities and universities of applied sciences.
- National monitoring of student satisfaction for government policy and research by buyers of the NSE results (including the Dutch Inspectorate of Education, the Dutch Ministry of Education, the Expert Centre on Inclusive Education (ECIO), the VSNU (University Association) and Vereniging Hogescholen (Netherlands Association of Universities of Applied Sciences) and the LSVb), by monitoring student satisfaction trends over several years.
- Academic research.
- Improvement information for universities and universities of applied sciences through comparison of scores for different course programmes so faculties can learn from each other and to benefit research to improve the quality of education.

Consent question by the institute of higher education: traceable student responses

At the start of the NSE, the institute of higher education will let LCSK know whether it wants to receive a link file with the NSE results. This link file consists of the student’s email address and the survey ID. It enables the institute of higher education to link the student’s NSE answers to the student’s other available data, for the purpose of evaluating, monitoring and improving the institute’s course programmes or related policy. If the institute of higher education wishes to receive a link file, all students at that institute will be asked to give their consent to the sharing of their data with their university or university of applied sciences after completing the survey. Only those students who give consent will be included in the list with email addresses and survey IDs in the link file. At the time of consent, students should be fully informed by the institute of higher education about the nature and purpose of the data processing. LCSK will include a link in the student’s consent question where this information is provided by the relevant institute of higher education. The password for the link file is

provided once to the person who was registered with LCSK as the recipient of the password for the link file.

All responses of consenting respondents to the NSE and the labels supplied are included in the NSE result file that the institute receives (institute file).

Respondents who do not give their consent are guaranteed that their responses will not be included in the institute's file in a way that can be traced back to them. This means that not all the student's background characteristics that have been asked about in the questionnaire are included in the institute file and that these respondents do not appear in the link file.

Special personal data: support need

The NSE questionnaire includes a block of questions entitled "Studying with a support need". This block of questions begins with a question on the student's express consent to the processing of this information because of the special category of personal data contained in this block of questions. Based on the answers to these questions, students may be indirectly identifiable by their institute of higher education. Students are informed about this and asked for their express consent before the start of this block of questions.

It may occur that a student consents to having their answers to the block of questions about their support need be passed on and chooses to remain anonymous for the generic consent question. In this case, the answers to the support need questions will be provided to the institute of higher education and other answers will be processed anonymously.

Data processing

The NSE questionnaire consists of a) questions on satisfaction, to be answered using a scale of 1 through 5 or, alternatively, as "not applicable" and b) open questions.

Students' responses to open questions will be passed on to institutions unchanged. We do not check this input for traceability to individual students. If students provide information such as their name or other information that can be used to trace them, they are not anonymous in that file. This file cannot be linked to the file that contains the responses to questions on satisfaction.

The results of the questions on satisfaction are used to create institute-specific result files. If an institute of higher education chooses to receive the answers of students anonymously, the responses of these students are not supplied to the institute of higher education if this would result in a population of fewer than five students based on background characteristics and any labels. This means that students cannot be identified in a combination of data.

If an institute of higher education chooses to receive the answers of students non-anonymously, the responses of the respondents who have given their consent for this are included in the institute file without protection against indirect identification. In addition, a link file will be supplied containing those students' email addresses and survey ID's; this enables the institute of higher education to link the students' NSE answers to their available background data for the purpose of evaluating, monitoring and improving the institute's course programmes, policies and related services.

Respondents who do not give their consent are guaranteed that their responses will not be included in the institute's file in a way that can be traced back to them. This means that not all the student's background characteristics that have been asked about in the questionnaire are included in the institute file and that these respondents do not appear in the link file.

Furthermore, data files will be created for third parties for the purpose of offering course selection information and conducting scientific and/or statistical research. These files are created without the risk of indirect traceability to an individual student.

Retention periods

Email addresses received from institutes of higher education shall be deleted by 14 October 2024 at the latest. The link files, which contain email addresses, are also destroyed at that time.

The unclean data that is collected with the NSE is stored by the MWM2 research agency for LCSK. This file does not contain any email addresses or other direct personal information.

The raw data files are retained for future use of the data for archiving for public interest or scientific or historical research. The raw data can also enable a future party to replicate the raw data processing into a benchmark file. If the supplier has performed this task for a historic year, the research firm has demonstrated beyond doubt that they possess the knowledge and expertise to perform the NSE data processing correctly. This guarantees the continuation of high-quality progress of the NSE implementation in the transfer to another party.

Suppliers involved

For the implementation of the NSE, processing contracts have been concluded with the research firm MWM2 and with Berger. The data processing by these processors takes place within the EU. Berger, registered under Chamber of Commerce number 34332882, performs quality checks on the NSE data on behalf of LCSK; the company can provide further analyses of the data and deliver tailor-made solutions. LCSK remains responsible for these processing operations.

Automated decision-making

Decisions on matters that may affect individuals are not taken on the basis of automated processing.

Viewing, modifying or deleting data and the right to be forgotten

Each NSE participant has the right to view, correct or delete their personal data, to withdraw their consent to the processing of their personal data or to object to the processing of their personal data. The right to data portability also applies. This means that the participant can submit a request to LCSK to send them, or an organisation designated by them, a computer file containing the personal data about them that LCSK has at their disposal.

A request for inspection, correction, deletion, transfer of personal data, withdrawal of consent, or objection to the processing of personal data can be submitted via student@nse.nl. To process the request, the student is requested to send or confirm this request from the email address used to send the NSE invitation. LCSK will respond to requests as quickly as possible, but no later than within four weeks. LCSK will inform this student about each recipient of their personal data, or about the rectification or deletion of personal data.

The GDPR privacy legislation also lists a number of situations in which the right to be forgotten does not apply. In these situations, the data subject cannot ask an organisation to delete personal data. The right to be forgotten does not apply when the organisation processes the data because there is a legal obligation to do so. Universities and universities of applied sciences are legally obliged to provide student data for the NSE to be carried out. When LCSK receives a student's request to enforce the right to be forgotten, this request is considered and processed as an opt-out of the 2024 NSE mailing

list. The data of these students as mentioned on page 1 is not removed from the research population. The reason for this is that in that case, the population no longer corresponds to the actual student population. The population data are used for weighting and correcting the NSE results. Complying with such a request would negatively affect the quality of the research.

LCSK and MWM2 can only trace students via their email addresses. Once all student email addresses are deleted, all data is anonymised and LCSK can no longer process requests for review, correction, deletion, data transfer, or withdrawal of consent. All email addresses will be deleted on 14 October 2024.

Within a research context, some rights may be restricted to a lesser or greater degree in different circumstances, such as where exercising these rights would seriously impede research or stop research objectives from being achieved. Students can take the survey from 15 January 2024 up to and including 10 March 2024. Respondents can be removed from the 2024 NSE up to and including 22 March 2024. At that point, the implementation of the study enters its final stage. The implementation of the NSE would be too seriously compromised to allow for the removal of respondents at that point. Up to and including 22 March 2024, students who have previously chosen to participate in the survey in a way that involves their answers being traceable to them can still have their responses made untraceable.

If a respondent withdraws their consent for the NSE, this has the following consequences:

Withdrawal of consent before the study:	The right to be forgotten does not apply to personal data provided on a legal basis by universities and universities of applied sciences. This request is therefore processed as an opt-out for the 2024 NSE mailing list.
Withdrawal of consent during the study:	<p>Until 22 March 2024, data collected from students completing the survey can be either:</p> <ul style="list-style-type: none"> - Deleted on request, or - Retroactively anonymised, in the case of responses from students who previously chose to participate in the NSE non-anonymously. <p>After that date, the implementation of the NSE would be too seriously compromised to allow for the removal of respondents.</p>
Withdrawal of consent after the study:	When the study is published and finalised, the survey data will be anonymised on 14 October 2024 by deleting the email addresses, ensuring the data cannot be traced back to individuals.

Complaints

The parties concerned have the right to file a complaint to the national supervisory authority, the Autoriteit Persoonsgegevens (AP, the Dutch Data Protection Authority).

Security of personal data

LCSK and MWM2 take appropriate measures to prevent misuse, loss, unauthorised access, unwanted disclosure and unauthorised modification of the data. If a participant feels that their personal data is not properly protected or if there are indications of abuse, they can contact student@nse.nl.

Data of contacts at institutes of higher education

For the implementation of the NSE, different contacts have been appointed for each institute of higher education. LCSK has the names of the institution where the person is employed, their first and last names, their email address and, if necessary, their telephone number.

Contacts are kept informed of developments via the “NSE Bijblijver” email newsletter. All correspondence with the NSE contact via the info@nse.nl email address about file supply, check and delivery, will be retained for justification and reference purposes. This includes contact information for the contacts.