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# Guidelines for processing personal data as part of study assignments at Södertörn University

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1. Background

One aim of the General Data Protection Regulation (GDPR) is to protect individuals’ fundamental rights and freedoms, especially their right to the protection of their personal data. Södertörn University is the controller for all processing of personal data performed as part of its activities. This also applies to personal data that students process as part of a study assignment. For example, as a student, when you write an essay as part of a course or programme, Södertörn University is responsible for any personal data you intend to collect and process. Your processing of personal data must comply with GDPR and with these guidelines.

1. Description

These guidelines include a seven-step routine that students must follow when processing personal data as part of an assignment. By following the routine, you ensure that you are processing personal data in a legally correct manner. If you have questions about your assignment, please contact your supervisor.

1. Definitions

**Study assignment –** A study assignment could be a degree project, discussion paper, essay or other assignment that includes the processing of personal data and which is done as part of a course or programme at Bachelor’s or Master’s level.

**Personal data –** Personal data are all kinds of information that can be linked, directly or indirectly, to a living person. This can include names, addresses, email addresses, IP addresses and personal identity numbers. Photographs and audio recordings may comprise personal data if a person is identifiable.

**Personal data processing –** In principle, everything that is done digitally with personal data, from typing them into a computer, storing, scanning, photographing, editing, processing, analysing, printing, emailing, to making a backup and erasure, counts as personal data processing. Personal data that is collected manually and then compiled in an electronic format is also considered to be a processing of personal data that is covered by the GDPR. One example is a written questionnaire that is then compiled electronically. Sometimes, manual (handwritten) notes are also considered personal data processing if they are adequately structured, i.e. if they are included – or are intended for inclusion – in a manual registry that is searchable in a manner that makes it easy to find particular information about a particular person for later use.

**Sensitive personal data** – Sensitive personal data is data about ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health (e.g. sick leave, pregnancy and doctor’s visits) and a person’s sex life or sexual orientation. Genetic information (e.g. data from DNA analysis) and biometric data that is used to definitively identify a person (e.g. facial recognition or fingerprints) also comprise sensitive personal data.

**Privacy-sensitive personal data** – There are personal data that are not classed as sensitive personal data, but which may be sensitive in terms of privacy. These could be salary data, information about legal offences (e.g. convictions in criminal cases or suspected involvement in crimes), assessment data (e.g. from appraisals, results from personality tests and personality profiles), information relating to someone’s private life or their social circumstances. Personal identity numbers are also considered privacy-sensitive personal data.

**Non-sensitive personal data** – Because each piece of data that can be directly or indirectly linked to a living person is considered personal data, the concept of non-sensitive personal data is often used to describe data that is neither sensitive nor privacy-sensitive personal data. Examples of personal data that are normally regarded as non-sensitive are names, telephone numbers, email addresses and employment positions.

**Controller** – The personal data controller is the entity that decides why (purposes) and how personal data must be processed. When personal data is processed as part of a study assignment at Södertörn University, the university is the controller.

1. Routine for personal data processing in study assignments
	1. Step 1: Is personal data processing necessary?

The first issue you must consider is whether personal data processing is really necessary. If your study could be conducted with the same level of quality but without processing personal data, this is preferable. GDPR does not apply if you do not use personal data, which makes work easier.

Please remember that all kinds of information that can be linked, directly or indirectly, to a living person comprises personal data. This means that personal data are not restricted to names, personal identity numbers or email addresses, they could also be a combination of more anonymous data that makes it possible to identify a particular individual.

**Example:** You want to interview someone who was born on 4 April 2000 and has the postcode 123 45. You write their contact details in a document. There is only one person registered with that postcode and that date of birth. Altogether, the data can be linked to a living person and thus comprises personal data.

If you wish to conduct an “anonymous” survey as part of your study assignment, remember that this is usually regarded as processing personal data according to the GDPR. Data is only anonymous if it is absolutely impossible for anyone to link the data to an individual. GDPR applies if the survey tool logs the IP address or saves some form of indirect information about the person who responded to the survey. Additionally, the use of free text responses always entails a risk that the respondent submits direct or indirect personal data about themself or others. You should assume that most surveys entail collecting some form of personal data, at least during the collection phase.

* 1. Step 2 – Define the purpose of the processing and which personal data need collecting

Before you begin collecting personal data, you must decide which personal data will be collected and for what purpose. If you are going to do a study assignment this should not be a difficult task, as the purpose of the personal data processing is to conduct the survey that is necessary for doing this assignment. However, it is important that you consider the purpose of the assignment, so you can decide which personal data you need to process.

**Example:** You are going to do a degree project in which you want to investigate people’s opinions about social media. As part of this, you want to interview ten people. To book times for these interviews, you may need to collect the participants’ names, email addresses and phone numbers. You could state the purpose of processing the personal data in the following manner:
“The purpose of my degree project is to investigate people’s opinions about social media. To do this, I need to process the following personal data: your name, email address and phone number.”

* 1. Step 3 – Will sensitive personal data will be processed? If yes, is this necessary for the purpose of the study assignment?

In principle, processing sensitive personal data is prohibited under the GDPR. However, there are some exceptions. For study assignments, express permission from a person who intends to participate in the study is one such exception. If you consider it necessary to collect sensitive personal data to complete your study assignment, this must be approved by your supervisor. Your supervisor must assess the appropriateness of the study assignment to ensure that the work can be carried out in an ethically acceptable manner. This assessment must be done before the personal data is collected.

The supervisor assesses the appropriateness of the planned study assignment.

If the supervisor assesses that processing sensitive personal data is necessary and that work can be conducted in an ethically sound manner, you may process sensitive personal data. If not, you may not process sensitive personal data.

Remember that, as a student, you must place extra emphasis on the clarity of the consent, so that the intended study participant understands that sensitive personal data will be processed. In addition, processing sensitive personal data requires increased security (see step 4).

* 1. Step 4 – Decide how personal data will be securely stored and processed during your work

The personal data you plan to collect must be managed securely, so you must store material containing personal data using the storage services provided by Södertörn University. Private storage services, such as Dropbox, Google docs, iCloud, etc., may not be used. Additionally, storing personal data on private computers or unencrypted hardware such as USB drives, smartphones or tablets, is inappropriate.

If the personal data is to be collected via a questionnaire, you can use the survey tools offered by the university. Interviews may take place remotely and be recorded via the university’s digital tools. If sensitive or privacy-sensitive persona data will be processed, the interviews should take place in person, or via Zoom or a telephone meeting, where the recording is done using a Dictaphone and then transcribed.

Remember not to share files that contain personal data with anyone who does not need to access the personal data. The people who may need to access this data are your supervisor and the examiner. When working with personal data, it is important that you keep printouts and other materials within sight. Make sure you lock or log out from the computer when you take breaks or leave the room during personal data processing.

* 1. Step 5 – Collecting consent and providing information about personal data processing

If, as a student, you are going to process personal data, you must collect the consent of that person. For consent to be valid, the study participant must have received enough information about the personal data processing to be able to provide informed consent to their participation. This information must include the purpose of the personal data processing, the legal basis for the personal data processing and how long the personal data will be processed. For study assignments, personal data may be processed until the assignment has a pass grade registered in Ladok. After this, the personal data must be erased.

In addition to the above, consent must be provided voluntarily. This means that if someone declines to participate in the study, there will not be any negative consequences for them. Södertörn University has produced a template for the information and consent forms to be used for study assignments. If you intend to process sensitive personal data and your supervisor has approved it, this must be clearly stated in the information and consent forms. The university has therefore produced a template specifically for information and consent forms for processing sensitive personal data.

Remember that someone who provided consent to participating in the study may withdraw that consent at any time, so it is important that you save the information and consent forms while you are working on the study assignment.

For the collection of consent from children, the basis is that children under 16 are not considered mature enough to provide valid informed consent. In these cases, the parent/guardian’s consent must be obtained.

Contact your supervisor if you are unsure what applies to consent.

* 1. Step 6 – Establish a register

Once you have collected personal data, you must establish a register. This register must contain a description on the type of personal data you are processing. Note that the register must not contain any actual personal data, such as names of interviewees.

Södertörn University has produced a register template that you must use. This is available on the university website. When you have completed the register, send it to your supervisor. It is important that your supervisor knows which types of personal data you are processing. You must also ensure that the register is updated while you are working.

* 1. Step 7 – Once the study assignment has a pass grade, erase the personal data

When your study assignment is finished and has received a pass grade, the material containing personal data (e.g. information and consent forms, sound files, transcriptions and name lists) must be erased. You must inform your supervisor as soon as you have erased the material with personal data.