

Faculty Board

Guidelines for the processing of personal data in degree projects at the Faculty of Social Sciences

What are personal data and sensitive personal data?

Personal data is defined as:

Every piece of information that refers to an identified or identifiable living natural person (often called the data subject). More simply, it means information through which it is possible to identify the person directly or indirectly. Examples of pieces of information that usually act as identifiers are: the name of a person, a photograph, an address, an email address, a personal identity number/coordination number or location data. Other examples are factors that are specific to, for example, the person's physical, psychological, economic, cultural or social identity.

Sensitive personal data is data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, membership of a trade union, the processing of genetic data and biometric data that is used to uniquely identify a natural person (i.e. personal data obtained through digital processing of photographs, voice recording or fingerprints that enable or confirm the identification of a natural person), as well as data about a natural person's health, sex life or sexual orientation.

When is it permitted to process personal data?

According to the General Data Protection Regulation (GDPR), processing of personal data may only take place if it rests on a number

of legal grounds (consent, contract, balance of interests, legal obligation, exercise of official authority or task in the public interest and fundamental interest). The Swedish Higher Education Act states that the university's remit is to conduct education, research and "shall include collaboration for mutual exchanges with the surrounding community, as well as ensuring that the knowledge and expertise found at the higher education institution bring benefit to society."

Personal data may be processed in degree projects

Lund University is the personal data controller for personal data processing undertaken by students within the framework of their studies, which means that the University may only collect and process an individual's personal data when there is support for the processing under GDPR. When it comes to personal data in degree projects, Lund University adjudges that the normal legal basis that supports personal data processing is that of public interest. Sensitive personal data may only be processed if consent has been obtained.

Processing of personal data

Processing of personal data is often necessary in order to fulfil the degree and learning outcomes in social scientific method and analysis.

The processing of personal data is to be treated with great care and the higher education institution is responsible for ensuring that the storage of data, for example, is done securely and that information is not spread. Personal data is not to be stored for longer than necessary and is to be deleted when it is no longer needed.

The processing of personal data must satisfy the fundamental principles that are listed in GDPR:

- data is to be processed in a legal, correct and open manner in relation to the person whose data is being processed
- personal data is to be collected for specific, explicitly stated and justified purposes

- the data is to be adequate, relevant and not excessively extensive in relation to the purposes for which it is being processed
- the data is to be correct
- the data is to be processed in such a way as to ensure appropriate security for personal data

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- In cases where the learning outcomes for the degree project in question can be achieved without processing personal data, personal data is not to be collected. If the student does not collect any information *through which the person can be directly or indirectly identified*, then the information gathered is not to be considered personal data and GDPR is not applicable. For example, completely anonymous data – where names have not been collected at the time of the interviews – is not generally to be considered personal data.
- If a supervisor adjudges that pieces of information that can link information to a specific individual are necessary in order to address questions in the degree project and in so doing fulfil learning outcomes, personal data may be collected. This applies, for example, to names, addresses, email addresses, personal identity or coordination numbers, location data, or information about a person's physical, psychological, economic, cultural or social identity that could identify the person in question. Audio recording of an individual's voice is personal data.
- In cases where personal data, such as names or other information can reveal an individual's identity are necessary in order to fulfil learning outcomes, the fundamental principles above are to be satisfied. In practice, this means that the participants' informed consent must be obtained, that data containing personal data may only be used in connection with the degree project, and that

personal data in the material will be subsequently deleted. It must not be possible to discern the individual's identity in the finished degree project. Consent is obtained in accordance with the form *Consenting to participation in degree project at the Faculty of Social Sciences*.

- As a general rule, written consent for the processing of sensitive personal data is to be obtained. In certain cases, for example data collection under authoritarian regimes or for certain groups, it is highly inappropriate to request written consent. In such cases, the student is to document in the degree project how oral consent was obtained without revealing the identity of those whose personal information has been processed.
- For the processing of personal data in respect of public figures, such as politicians and influencers, for example via social media accounts, there is an exemption from the ban on processing personal data, provided that the person themselves has made the data public. Where possible, the student is to inform those concerned that the information is to be used in connection with a degree project.
- Analysis of personal data consisting of published images from newspapers does not require the student to inform those who have been photographed.
- Personal data published by the public on social media may not be processed.
- Personal data collected in connection with degree projects may not be shared with others, used for other purposes or stored after the degree project has been assessed.
- Students may not film individuals in connection with degree projects.
- In cases where students gather data via surveys, Sunet Survey is to be used. Sensitive personal data must not be collected via surveys. This does not apply to degree projects or training assignments conducted on behalf of other public authorities (see below).

- Analysis of secondary data in existing national and international databases, e.g. European Social Survey or Demographic and Health Survey is not to be regarded as processing personal data.
- External cloud computing services, unencrypted USB drives and smartphones or tablets are not to be used for the processing of personal data, including sound recordings. Sound recordings are to be made with a Dictaphone.
- Files containing personal data may only be stored on encrypted USB drives. Data is to be deleted when the degree project has been examined and received a passing grade.

Degree projects or training assignments written on behalf of other public authorities

In cases where degree projects or training assignments are written on behalf of other authorities, it falls to the authority providing the assignment to ensure sufficient confidentiality with regard to the students, since LU is not the personal data controller. The authority in question should handle information in such a way that it does not leave the authority, and as such is not accessible to the University. This may, for example, mean making statistics from their own sources accessible, or organising the writing so that no data is transferred, for example by providing the student with premises and equipment within the authority. This also applies to students undertaking placement courses outside the University.

Does student work need to be subjected to ethical review?

The guidelines only refer to degree projects and training assignments that do not fall under the scope of the Ethical Review Act (2003:460).

The Act (2003:460) concerning the ethical review of research is not applicable to surveys conducted within the framework of first and second-cycle education. The Act applies only if the work is to be

published in a research context. The publication of results in scientific journals presupposes that the project has been subject to ethical review and approved before the collection of data begins.