

Orbyts GDPR Policy – 03/09/2025

1. Introduction

Orbyts is committed to protecting the privacy and security of all personal data we collect. This Privacy Policy explains how we collect, use, store, and safeguard personal data in compliance with the UK General Data Protection Regulation (GDPR), the Data Protection Act 2018, and relevant partner (university) institution policies. This policy sets out what we do to protect individuals' personal data. Anyone who handles personal data in any way on behalf of Orbyts must ensure that we comply with this policy. Orbyts is transparent about the data that it holds and ensures that it is used only for clearly defined educational, safeguarding, and impact evaluation purposes.

2. Who We Are

Orbyts is an educational partnership programme led by Research Inspired CIC that connects school students with researchers to collaborate on real scientific research projects. Scientific research is associated with a partner (university) institution. Both partner (university) institution and Orbyts follow the UK General Data Protection Regulation (GDPR), the Data Protection Act 2018. For Orbyts, our data controller is:

- Data Controller: Christian Lao
- Contact Email: christian.lao.21@ucl.ac.uk

and is responsible for ensuring compliance with the GDPR and with this policy. Any questions or concerns about this policy should be referred in the first instance to the Data Controller.

3. What Personal Data We Collect

We may collect and process the following types of personal data:

- Students: name, school, year group, pupil premium status, racial or ethnic origin, gender, authorship contributions, signatures when included in permission forms, dietary requirement and (if agreed) publication details (e.g. name or pseudonym).
- Parents/Guardians: name, higher education attendance, signatures when included in permission forms, contact information provided on consent forms.
- Teachers/Researchers: name, institutional affiliation, contact details for project coordination.

We do not collect unnecessary or excessive personal data.

4. How We Use Personal Data

We process personal data to:

- Obtain and manage consent for publication.
- Ensure safeguarding and compliance with legal and institutional requirements.
- Attribute contributions fairly in publications and acknowledgements.
- Provide confirmation letters of participation for students' future use (e.g. university/job applications).
- Communicate with schools, guardians, and students regarding project outcomes.
- Orbyts impact and evaluation reporting to external stakeholders (such as universities partners, funding agencies and website), this includes Higher Education Access Tracking (HEAT). All evaluation data is strictly anonymised with no identifying characteristics unless testimonial consent is strictly given.

5. Legal Basis for Processing

Our processing of personal data is based on:

- Consent: explicit written consent from parents/guardians (and students where appropriate).
- Legitimate Interests: safeguarding of participants, managing authorship, and ensuring fair recognition.
- Legal Obligation: compliance with GDPR, statutory safeguarding legislation, and partner university policies.

6. Data Retention

- Consent forms and related personal data are stored securely for the duration of the project and until final publication.
- Once no longer needed, data is securely deleted or anonymised.
- Orbyts retains only minimal records (e.g. anonymised authorship logs) for accountability.

7. Data Sharing and Disclosure

Orbyts ensures that personal data is not disclosed to unauthorised third parties, which includes family members, friends, and government bodies. Personal data may be shared only with:

- The Orbyts Leadership Team and safeguarding officers.
- Journal publishers (only if explicit consent has been given for authorship naming).
- Partner researchers and teachers directly involved in the project.

However, GDPR permits a number of exemptions where certain disclosure without consent is permitted, including:

- To safeguard national security
- Prevention or detection of crime, including the apprehension or prosecution of offenders
- Assessment or collection of tax duty
- Discharge of regulatory functions
- To prevent serious harm to a third party
- To protect the vital interests of the individual

All requests to provide data for one of these reasons must be supported by appropriate paperwork.

8. Data Security

All Orbyts data is stored on cloud services within the UK or European Economic Area (EEA), complying with data protection standards within this region. We use technical and organisational measures to protect personal data, including:

- Secure, access-restricted storage of consent forms.
- Encryption and password protection of digital files.
- Regular review of safeguarding and data protection practices.

9. Your Rights

Under GDPR, parents/guardians and eligible students have the right to:

- Access personal data held about them or their child.
- Request correction of inaccurate data.
- Request deletion of data, where lawful.
- Restrict or object to processing.
- Withdraw consent at any time (before publication).
- Lodge a complaint with the UK Information Commissioner's Office (ICO).

10. How to Exercise Your Rights

Requests to exercise data protection rights can be made by contacting:

- Orbyts Leadership Team: info@orbyts.org
- Data Controller: Christian Lao (christian.lao.21@ucl.ac.uk)

11. Changes to This Policy

This policy is reviewed annually in consultation with schools, researchers, and institutional safeguarding officers to ensure that it is achieving its objectives. Should any weaknesses in the policy be highlighted or any legislative requirements change, the policy will be reviewed immediately. Updates will be communicated via schools and published on the Orbyts website.

12. Contact Information

If you have any questions about this policy or how your data is handled, please contact:

Orbyts Leadership Team

Research Inspired CIC

Email: info@orbyts.org or safeguarding@orbyts.org