

# Privacy Notice for the evaluation of the early roll-out of the Early Career Framework

The purpose of this document is to explain what personal information (data) will be collected as part of this research into the early roll-out of the Early Career Framework, why we are collecting it and who is responsible for keeping it safe.

## 1 Why are we collecting this data?

The National Foundation for Educational Research (NFER) is collecting personal data to support the evaluation of the early roll-out of the Early Career Framework (ECF).

The Department for Education's (DfE's) ECF sets out what newly qualified teachers in their first two years of teaching need to learn. It is underpinned by an extended, fully-funded, two-year package of professional development, designed to support early career teachers to remain in the profession. The support includes time off timetable, training and self-study materials, and additional mentoring. Professional development as part of the early roll-out of the ECF reforms is being provided by four organisations: Ambition Institute, Education Development Trust, Teach First and a consortium led by UCL. The ECF is initially being rolled out in the North East, Bradford, Doncaster, and Greater Manchester. Participation in the early roll-out is open to all primary and secondary schools in these areas to support their newly qualified teachers from September 2020.

The Education Endowment Foundation (EEF), a charity that aims to support teachers and senior leaders by generating evidence of 'what works' to improve teaching and learning, has commissioned the evaluation of the early roll-out of the ECF. The evaluation will run from July 2020 to December 2023 and will compare the retention outcomes of early career teachers' receiving support through the early roll-out of the ECF with a comparison group of schools that are not participating. The study will also investigate the impact of early roll-out of the ECF on: teaching quality; self-efficacy; job satisfaction; and workload. It will explore teachers' views about what is working well or otherwise and identify challenges (including the reasons why schools from early roll-out areas declined to participate) and solutions to scaling up ahead of planned national roll-out from September 2021. Induction leads in both intervention and comparison group schools who complete an online survey will be offered tailored feedback reports based on selected responses to the induction leads questionnaire, allowing them to compare their responses to those of other schools in the same phase.

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## 2 Who is this research project funded by?

The DfE are funding the delivery of the early roll-out of the ECF and EEF are funding the evaluation of this programme. NFER have been appointed by EEF as the independent evaluators. NFER are sometimes referred to as the 'DfE's appointed evaluator' in documentation relating to the early roll-out of the ECF. The four providers' general privacy notices or fair processing statements can be found at the links below:

- Ambition Institute: <https://www.ambition.org.uk/cookies/>
- Education Development Trust: <https://www.educationdevelopmenttrust.com/privacy>
- Teach First: <https://www.teachfirst.org.uk/privacy-policy>
- Consortium led by UCL: <https://www.ucl.ac.uk/legal-services/privacy/general-privacy-notice>

This evaluation will draw on personal data collected directly from participants by NFER as well as that collected by the four providers and the DfE. For the purposes of data protection legislation, the DfE is the data controller and the providers the data processors for the personal data they process as part of the delivery of the programme.

NFER and DfE are joint data controllers for any personal data used as part of the evaluation of the ERO. This means they are jointly responsible for deciding how any personal data is used and for keeping it safe. The providers are data processors. This privacy only covers data processed for the evaluation. For teachers' administrative data obtained from the School Workforce Census (SWC), NFER will be the data controller.

## 3 What is the legal basis for processing activities?

The legal basis for processing personal data is covered by:

GDPR Article 6 (1) (f) which states that 'processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of the personal data'.

We have carried out a legitimate interest assessment, which demonstrates that the evaluation fulfils one of NFER's core business purposes (undertaking research, evaluation and information activities). It cannot be done without processing personal data but processing does not override the data subject's interests. The evaluation will contribute to the evidence base on what works in supporting teachers early in their careers.

A separate legal basis for processing special category personal data has been identified:

GDPR Article 9 (2) (j) which states 'Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be

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proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

This processing should not cause substantial damage or distress to the data subjects. Processing this data will not result in any decisions being made about them.

## 4 How will personal data be obtained?

NFER will collect personal data regarding school participants via the following methods:

- For participating early roll-out schools:
  - surveys, a 'usual practice' proforma and interviews, with induction leads/senior leaders
  - surveys and interviews with early career teachers
  - interviews with school-based mentors
  - teachers' administrative data obtained from the School Workforce Census (SWC)
  - data collected by the four provider organisations and DfE, including contact details for the induction lead, mentors and ECTs
- For comparison schools:
  - surveys and a 'usual practice' proforma with induction leads/senior leaders
  - surveys with early career teachers
  - teachers' administrative data obtained from the School Workforce Census (SWC).
- For schools that decided not to participate in the early roll-out of the ECF:
  - interviews with induction leads/senior leaders

NFER will also collect personal data regarding DfE staff and providers via the following method:

- Interviews with representatives from the four provider organisations and the DfE.

## 5 What personal data is being collected by this project?

Personal data for this evaluation will include:

- Personal identifiers, contacts and characteristics of **early career teachers**. This information will be used to invite teachers to participate in evaluation activities, to match ERO participants to

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their SWC records, and to support analysis of the findings. Personal data will be collected on: name, job title/role, gender\*, Teacher Reference Number (TRN), date of birth, school name, address and URN, email address, phone number, subject(s) taught and/or phase, degree specialism, working patterns, whether the teacher is still in the teaching profession two years after the programme (i.e. retention in the profession), whether the teacher is still in the same school two years after the programme (i.e. retention in the school in which they began their induction) and notification and reason of withdrawal from the programme (where applicable).

- Personal identifiers, contacts and characteristics of **mentors** and **induction leads**. This information will be used to invite teachers to participate in evaluation activities, and to support analysis of the findings. Personal data will be collected on: name, job title/role, Teacher Reference Number (mentors only), school name, address and URN, email address, phone number, background and experience relevant to their role as a mentor (e.g. subject(s) taught and/or phase, degree specialism, length of time in teaching, prior mentoring experience) working patterns and notification and reason of withdrawal from the programme (where applicable).
- **Early career teachers', induction leads'/senior leaders' and mentors'** views and experiences (including, for example: frequency and engagement in early-career professional development activities, perceptions of the quality and impacts of early-career support, information about the time/costs associated with the activities, how the support programme differs from usual provision for early career teachers in participating schools, 'business as usual' support for early career teachers in comparison schools, reasons for declining to participate in the early roll-out in schools which did not take up the offer).
- Information on participants' programme engagement (including, for example: attendance at provider organisation induction/training events and engagement with the programme materials and activities).
- **Providers' staff names**, contact details, job titles/roles, and views about programme (e.g. implementation, engagement and impacts).
- **DfE's staff names**, staff names, contact details, job titles/roles and views about programme (e.g. implementation, engagement and impacts).

\*Gender is considered to be special data in SWC.

## 6 Who will personal data be shared with?

DfE and the four provider organisations will share all personal data securely with NFER via a secure, password-protected portal.

Schools will sign up to the project via online survey software Questback. Their privacy policy can be found here: <https://www.questback.com/data-privacy/privacy-policy/>

Within three months of the end of project, NFER will send school and teacher data to EEF's data archive partner via a secure, password-protected portal. This will include school names, administrative teacher data (such as teacher name, date of birth, TRN and role) matched to SWC, management information and surveys data. No information from the provider or DfE staff interviews will be archived. At this point, EEF's data archive partner will keep a copy of the data and EEF will become the Data Controller. Anonymised data will also be stored with the DfE, the Office for National Statistics (ONS) and potentially other research teams. Further matching to SWC and other administrative data may take place during subsequent research.

No school or individual will be named in any reporting for this project, and findings from the evaluation will only be shared in anonymised form. The only exception to this is the tailored feedback reports that will be produced for induction leads. These will be based on selected responses to the induction leads questionnaire, allowing them to compare their responses to those of other schools in the same phase. These reports will be only be shared with the named school, using an email address provided by the induction lead; they will not be seen by the DfE or EEF.

The findings of the evaluation will be published in a final report, which will be freely available online, in early 2024.

ECTs in comparison schools will be offered an Amazon voucher for completing the surveys in recognition of the fact that they are not receiving the potential benefits of participating in the early roll-out of the ECF. Where ECTs agree to accept these vouchers, the names and email addresses provided by ECTs will be used to order and send the vouchers. ECTs in comparison schools who complete the survey in year one, will also be given the option for this email address to be used to send them the link to the survey in year two.

## **7 Is personal data being transferred outside of the European Economic Areas (EEA)?**

No personal data for is being stored or transferred outside of the EEA by NFER for this evaluation.

## **8 How long will personal data be retained?**

Personal data collected and used by NFER for the purposes of this evaluation will not be kept longer than is necessary and will be deleted securely in accordance with NFER's internal policy within one year of report publication, currently expected to be 2024.

## **9 What rights do I have over my personal data?**

Participants can withdraw from the programme and/or from their data being processed as part of the evaluation at any time. If participants choose to withdraw their data from being processed as

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part of the evaluation, they can still participate in the programme. The Department for Education, the Education Endowment Foundation, all the delivery providers and NFER appreciate schools' and staff's support in collecting the data outlined in this Privacy Notice as it is important for the validity of the programme evaluation. Should you withdraw from the programme or the evaluation, any personal data you have provided up to that point will still be used unless you indicate otherwise.

Under certain circumstances, you have the right:

- to request access to information that we hold about you (subject access request)
- to have your personal data rectified, if it is inaccurate or incomplete
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing
- to restrict our processing of your personal data (for example, permitting its storage but no further processing)
- to object to our processing
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you

If at any time you wish to exercise any of these rights and/or withdraw your data from the evaluation, please contact Priscilla Antwi on [p.antwi@nfer.ac.uk](mailto:p.antwi@nfer.ac.uk) or NFER's Compliance Officer on [compliance@nfer.ac.uk](mailto:compliance@nfer.ac.uk) with any queries.

## 10 Who can I contact about this project?

NFER is responsible for the day-to-day management of this evaluation. Contact Matt Walker on [m.walker@nfer.ac.uk](mailto:m.walker@nfer.ac.uk) with any queries.

If you have a concern about the way this evaluation processes personal data, we request that you raise your concern with us in the first instance (see the details above). If you are still dissatisfied, you can contact the Information Commissioner's Office, the body responsible for enforcing data protection legislation in the UK, at <https://ico.org.uk/concerns/>.

## 11 Last updated

We keep this privacy notice under review to make sure it is up to date and accurate. Any changes will be noted. This privacy notice was updated on 28<sup>th</sup> May 2021 to show that ECTs in comparison schools who complete the survey in year one will be given the option for the email address they provide to be used to send them the link to the ECT survey in year two. It was also updated to confirm that providers are data processors.

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