Centre for Evidence and Implementation Privacy Notice for "Evaluating the EEF scale-up programmes"

Introduction

The Centre for Evidence and Implementation (CEI) is a research organisation which looks at how to improve services for children, young people and families. CEI is committed to protecting the privacy and security of any personal information that we collect.

Together with the Behavioural Insights Team (BIT), we are conducting an evaluation of the scaling activities of three programmes taking place in schools and nurseries across England. CEI is leading on the evaluation of one of these programmes called Maths Champions. This work is important to help us understand how these programmes are being run in a large number of schools and nurseries and any improvements that can be put into place to help them reach more schools and nurseries in the future.

This privacy notice sets out how we collect and use your personal data if you are a participant in this research project.

This research is being funded by the Education Endowment Foundation (EEF), and conducted in collaboration with the National Day Nurseries Association (NDNA) who provide the Maths Champions programme in nurseries.

Contact details

CEI is the controller and is responsible for your personal data collected in connection with this evaluation and BIT. This notice applies to the personal data we collect directly from you and personal data which is provided to us by third parties. Where we collect personal data from you directly, please make sure that any personal details you provide are accurate and up to date, and let us know about any changes as soon as possible.

BIT may also receive your data from CEI. Please refer to their privacy notice at <u>Privacy notice | The Behavioural Insights Team (bi.team)</u> for more information about their privacy practices.

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights in relation to your personal data, please contact the DPO:

Post: Centre for Evidence and Implementation, Albany House, The Evidence Quarter, Petty France, London Sw1H 9Ea ·

Email: dpo@theevidencequarter.com

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

What personal data will we collect?

Nursery staff data

We will collect personal data from nursery staff involved in the Maths Champion programme, including:

- Full name
- Nursery name
- Role at nursery and in relation to the programme
- Work email address
- Work phone number

National Day Nurseries Association (NDNA) staff data

We will collect personal data from staff (including consultants), including:

- Full name
- Role at NDNA
- Work email address
- Work phone number

Other education stakeholders data

We will collect personal data, including:

- Full name
- Work email address
- Work phone number

The Memorandum of Understanding signed by nurseries to participate in the Maths Champions programme for 2023/24 included information about this evaluation and informed that they may be contacted by an evaluator in order to arrange participation in evaluation activities.

We will collect this data directly from you and indirectly from NDNA if you have agreed for CEI to contact you. You may also have the opportunity to participate in interviews and surveys about your experience with the programme. We will ask for consent from you before collecting this data. Our handling of this data will be as below. We will access data routinely collected by NDNA on the delivery and implementation of Maths Champions nurseries (e.g., programme start date, completion of programme activities, attendance of webinars).

What do we do with information we collect?

CEI is collecting your personal data to jointly with BIT deliver an independent evaluation of the scale-up of three education programmes. We will collect the personal data described above for the purpose of contacting you to take part in surveys, interviews, and/or observations. Email address of those participating in the survey will be used for the purpose of a prize draw as well as further interview and survey opportunities as part of the research.

As part of this evaluation, CEI will be interviewing or surveying nursery staff in settings where one of these three interventions is being delivered to understand their experiences with the intervention, any changes that have been made to the intervention and how the intervention is being used. This information will then be shared with BIT. CEI will also use data collected from the organisations delivering the programmes to understand how successfully these programmes are being scaled and what some of the enablers and barriers to successful scaling are. We will use these data to produce a report and feedback slide decks for the organisations delivering the programmes.

What is our lawful basis for processing your personal data?

Data protection laws require us to meet certain conditions before we are allowed to use your data in the manner described in this notice, including having a lawful basis for the processing.

For all information collected, CEI is relying on the lawful basis of:

LEGITIMATE INTERESTS: Our lawful basis for processing the personal data listed above is legitimate interests (as per Article 6 (1) (f) of the GDPR) and we have considered that participants' interests and fundamental rights do not override those legitimate interests). It is necessary in CEI and BIT's 'legitimate interests' to process the personal data identified above in order to conduct an evaluation of the scale-up of the educational programme that has been commissioned by the EEF. The research project fulfils CEI and BIT's core business aims including undertaking research, evaluation and information activities in sectors that will deliver social impact.

Consent: we will ask for your consent before collecting some of this data.

Who has access to your information?

Your information will be accessed by a limited number of researchers and advisors in CEI's project team working on this project.

CEI may disclose your information to third parties in connection with the purposes of processing your personal data set out in this notice. These third parties may include:

- other companies in our group;
- regulators, law enforcement bodies and the courts, in order to comply with applicable laws and regulations, assist with regulatory enquiries, and cooperate with court mandated processes, including the conduct of litigation;
- suppliers, research assistants and sub-contractors who may process information on behalf of CEI and BIT e.g. cloud services to store data, transcription services, and survey platforms. These third parties are known as data processors and when we use them we have contractual terms and policies and procedures in place to ensure that your personal data is protected. This does not always mean that they will have access to information that will directly identify participants as we will share anonymised or pseudonymised data only wherever possible. We remain responsible for participants' personal information as the controller; and
- any third party to whom we are proposing to sell or transfer some or all of our business or assets.
- We may also disclose your personal information if required by law, or to protect or defend ourselves or others against illegal or harmful activities, or as part of a reorganisation or restructuring of our organisations.

International transfers

Your personal information will not be transferred outside of the UK and the European Economic Area.

Security

We take reasonable steps to protect your personal information and follow procedures designed to minimise unauthorised access, alteration, loss or disclosure of your information.

Data retention

We will only retain participants' personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. When it is no longer necessary to retain participants' personal data, it will be securely deleted.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of personal data, the purposes for which we process personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Taking the above factors into consideration, our anticipated date of deletion for your personal data is February 2027 (within six months of the final report being published).

In some circumstances, we will retain an anonymised dataset (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to participants.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data, including rights to:

- Request access to your personal data: This enables you to receive a copy of the personal data we hold about you and to check we are lawfully processing it.
- Request correction of your personal data: This enables you to have any incomplete or inaccurate data we hold about you corrected.
- Request erasure of your personal data: This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it.
- Object to processing of your personal data: For example, you can object where we
 are relying on a legitimate interest (or those of a third party) and there is something
 about your particular situation which makes you want to object to processing on this
 ground as you feel it impacts on your fundamental rights and freedoms.
- Request restriction of processing your personal data: This enables you to ask us to suspend the processing of your personal data.
- Data portability: Where the processing takes place on the basis of your consent or contract, and is carried out by automated means, you have the right to request that we provide your personal data to you in a machine-readable format, or transmit it to a third party data controller, where technically feasible.
- Withdraw consent to the processing of your personal data: This applies where we
 have relied on consent to process personal data. Please note that withdrawal of
 consent will not affect the lawfulness of any processing carried out before
 withdrawing your consent.
- Not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you. Please note that BIT does not engage in automated decision making without manual intervention in its research projects.

If you wish to exercise any of the rights set out above, please contact the Data Protection Officer with your specific request by email to: dpo@theevidencequarter.com

It is important to understand that the extent to which these rights apply to research will vary and that in some circumstances your rights may be restricted.

Please also note that we can only comply with a request to exercise your rights during the period for which we hold personal information that identifies you. If personal data has been irreversibly anonymised and has become part of the research data set, it will not be possible for us to comply.

Changes to this Notice

We may change this Privacy Notice from time to time. If we make any significant changes in the way we treat your personal information we will make this clear by updating the notice on the CEI website or by contacting you directly.

Last updated: 12 March 2024