

Privacy Notice for research into approaches to supporting SEND pupils in multi-academy trusts

The purpose of this document is to explain what personal information (data) will be collected as part of this research project, 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 as part of research into the approaches used by multi-academy trusts (MATs) to support the outcomes of pupils with Special Educational Needs and Disabilities (SEND) in mainstream secondary schools.

The project will explore the approaches used across MATs in supporting secondary pupils with SEND, the extent to which trusts with specialist provision are drawing on this to support their mainstream schools, and the challenges MATs are facing and how these have been overcome.

2 Who is this research project funded by?

The research is being funded by NFER. For the purposes of data protection legislation, NFER is the data controller, meaning NFER is responsible for deciding how any personal data is used and for keeping it safe.

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 project 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 project will provide new insights into how school trusts are leveraging on their unique structures to meet SEND pupils’ needs. It will also identify how the

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challenges in supporting pupils with SEND are evolving and how these are being addressed across the sector.

4 How will personal data be obtained?

NFER will collect personal data via one-to-one and small group interviews with senior school and trust leaders, special educational needs coordinators (SENCOs), and other teaching staff who can talk about the support being provided to pupils with SEND. The interviews will be conducted remotely by telephone or video call.

We will use publicly available trust and school email addresses that we hold on internal systems, together with web searches and recommendations from third parties, to contact trusts/schools and invite them to participate in the research. We will ask the trust representative to identify the relevant staff for us to speak to. We anticipate that school trusts will either set up the interviews on our behalf, or pass on the relevant contact details (e.g., name, email address and telephone number) for NFER researchers to contact the relevant staff directly.

5 What personal data is being collected by this project?

The interviews will collect information from trust/school senior leaders, SENCOs and teachers about how their trust is supporting pupils with SEND. Personal data will include:

- name, email address, telephone number, role and school and trust names
- views on support provided to pupils with SEND, the main challenges faced and the degree to which these have been overcome.

A name and email address will be collected for all interviewees who wish to receive an Amazon voucher as a thank you for taking part.

6 Who will personal data be shared with?

Interviews may be undertaken via telephone or by using the video conferencing software provided by Microsoft Teams. The privacy notice for Microsoft Teams can be found here: <https://docs.microsoft.com/en-us/microsoftteams/teams-privacy>.

The interviews may be recorded so the research team can ensure the notes they produce are accurate. The recording will not be listened to/watched by anyone outside of the research team and your permission to record will be asked at the start of the interview.

No individuals will be named in the final report, but participating MATs will be given the opportunity to be named on an acknowledgement's page.

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

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As a thank you for taking part, interviewees will be offered an Amazon voucher. Where interviewees agree to accept these vouchers, their names and email addresses will be used to order and send the vouchers.

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

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

8 How long will personal data be retained?

NFER will retain personal data until the completion of the project in March 2024. Personal data such as contact details will only be kept as long as they are required for the specific purpose for which they were collected. Interview recordings will be deleted as soon as anonymised or pseudo-anonymised datasets or written transcripts have been produced. All other data will be stored for six months following the publication of the final research report, then securely deleted.

9 How is the security of your data maintained?

NFER has measures in place to prevent personal data being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. NFER limits access to personal data to staff members who have a business need to see it. NFER has been certified to ISO27001 (GB17/872763) the internal standard for information security and holds Cyber Essentials Plus (0 5 6 9 0 4 6 c - a 7 6 9 - 4 8 a b -9 2 9 9 - 1 5 5 3 4 a 6 8 a b 3 0). NFER operates Microsoft Windows Operating Systems and industry standard enterprise software such as databases and email, all managed to recognised industry standards with a full patching regime. All NFER laptops and mobile storage devices are encrypted and accessed with PIN-codes and strong passwords. Annual penetration tests are carried out by a CHECK-accredited supplier and remediation undertaken. We use a replicated disaster recovery service (RDRS) which allows the business to continue to operate in the event of failure.

10 What rights do I have over my personal data?

Participants can withdraw their data from being processed at any time during the project. Should you withdraw from the research, 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 project, please contact the Project Leader Lillian Flemons (l.flemons@nfer.ac.uk).

If you wish to make a subject access request, restrict or object to processing, please contact our Compliance Officer (compliance@nfer.ac.uk).

11 Who can I contact about this project?

NFER is responsible for the day-to-day management of this evaluation. Contact the Project Leader Lillian Flemons (l.flemons@nfer.ac.uk) with any queries.

If you have a concern about the way this project 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/>.

12 Last updated

We keep this privacy notice under review to make sure it is up to date and accurate. Any changes will be noted.

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