Privacy Notice for Stakeholder Communications

NFER’s widely respected research evaluations inform educational policy and provide sound evidence in education debates and national reviews. NFER also develops outputs, products and services for schools, informed by our evidence. We provide a wide range of marketing and information communications to share details across the education sector. This privacy notice sets out how we process your personal information as part of these activities.

NFER Stakeholders are considered to be, but not limited to, those from the education community, key education influencers and policy makers, clients and practitioners.

For the activities described in this privacy notice, NFER is the data controller unless stated otherwise.

### 1 Why are we collecting this data?

<table>
<thead>
<tr>
<th>Stakeholder Communications – NFER news, updates and stakeholder survey</th>
<th>NFER’s widely respected research evaluations inform educational policy and provide sound evidence in education debates and national reviews. NFER brings to your attention recently published research data (for example our teacher retention and turnover research), updates from our impact review and invitations to events which may be of interest to you or your organisation. From time to time, NFER may contact its stakeholders for feedback to help improve the services and products we provide.</th>
</tr>
</thead>
</table>
| Newsletters | You have signed up and agreed to receive one or more of NFER e-newsletters and information bulletins, currently:-  
- NFER Direct: monthly e-newsletter covering all NFER activities  
- NFER Direct for Schools: monthly e-newsletter for schools and teachers  
- Assessment newsletter |
<table>
<thead>
<tr>
<th>Category</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>One-off notifications / expressions of interests</td>
<td>You have asked to be notified when NFER publishes a report or expressed interest in participating in a research study or trial.</td>
</tr>
<tr>
<td>Marketing information to schools</td>
<td>If you express an interest in our products and services, we may send you emails or letters providing more information about those products and services. We will only use that expression of interest information to contact you about updates relating to the product or service you have expressed an interest in. You can unsubscribe from these communications at any time.</td>
</tr>
<tr>
<td>Market research with schools</td>
<td>NFER value gaining feedback and insights from those who work in and for schools around our resources, services and how we can best support the education community. We may send you invitations to complete surveys or participate in focus groups which NFER will run internally, or we may work with a third party supplier to carry out this market research on our behalf. Sometimes we will commission a third party to use their resources and expertise to undertake this type of work without sharing personal data with NFER. They act as data controller and are responsible for compliance with data protection requirements. Where a third party is conducting the research and personal data is processed on NFER’s behalf, NFER is the data controller and the supplier acts as the data processor.</td>
</tr>
<tr>
<td>Event management and organisation</td>
<td>NFER occasionally works with outside organisations and industry professionals to host events on key research topics which may be of interest to you or your organisation. Events can be in person or online.</td>
</tr>
<tr>
<td>Social media, email and website interaction monitoring</td>
<td>We monitor your social media, email and website interactions with us. This helps us to respond to your comments and feedback, understand how NFER is perceived outside of the organisation and gain additional insight into how to share our research outputs to ever larger audiences. It also helps us understand how audiences use and engage with our digital platforms to inform improvement of our digital communications activity.</td>
</tr>
<tr>
<td>School Leader Panel</td>
<td>NFER maintains a panel of school leaders from England and Wales to help with our programme of work and to support our charitable purpose of improving outcomes for future generations</td>
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</tbody>
</table>
everywhere and to support real, positive change to the education system.

## 2 What personal data is collected?

| Stakeholder Communications | We gather the following information on our stakeholders:-
|                           |   - Name, job title, organisation, e-mail address, postal address, and contact numbers.
|                           | We access data which is in the public domain, as well as collect data through various networking events and client contacts. This is then stored within our password protected data management system.
|                           | In our annual stakeholder survey, your name and position/organisation is requested to be published against any comments provided in the comment box of the survey. Your consent is requested via an opt in/out selection and if you opt in and agree to share your details, these will only be used alongside your comment if published in internal or external reports, marketing and publicity material. Your details will not be reported alongside any of your other responses and nobody at NFER will see your individual answers.
|                           | Attendance at NFER events will also be recorded.
| Newsletters               | With your consent, we collect your name and email address for the purpose of sending you communications in the form of our e-newsletters, which you have requested. If you decide that you no longer want to receive any of these emails from us, you can easily unsubscribe on an individual basis at any time via the link at the bottom of each e-newsletter.
| One-off notifications / expressions of interests | With your consent, we collect your name and email address to send you details of the item you have expressed interest in.
|                           | Your details will not be used for any other marketing activity.
| Market research with schools | Depending on the nature of the market research, we may ask you for background information on yourself and your school to provide context for the rest of your answers, or we may draw on our existing database of school data which contains this information to analyse the responses against.
|                           | Where this information is not required for the purpose of the research your responses will remain anonymous. We may ask
you for your views and experiences of engaging with NFER and our resources and services, as well as your opinions on improvements and opportunities for NFER in the future. Focus groups may be recorded and if so, digital images of the session will be gained with your consent.

**Event management and organisation**

We will ask you to provide details such as your name, email address, organisation and job title as well as any special requirements (dietary, access or other) in regards to specific events which you have been invited to.

We will inform you of events which may be photographed and/or filmed/recorded and how you can notify us if you do not wish to be photographed/filmed. These will be used, within both print and digital channels, for publicising the work NFER do.

**Social media, email and website interaction monitoring**

We use a number of third party services to monitor interactions with us (comments, likes, re-tweets etc) on social media, via email marketing platforms and our website platforms. If in the event of an enquiry, we may use your personal data to respond to your enquiry or to process your request.

**School Leader Panel**

We collect your name, contact details, and details of your school and role. As a member of one of our panels, you may be invited to NFER events but your details will not be used for any other marketing activity.

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

The legal basis for processing personal data depends on the communication activity being undertaken. They are set out in the table below:

| Stakeholder communications (including annual stakeholder survey) | GDPR Article 6 (1) (f) ‘processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interest are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of the personal data’ |
| School Leader Panel | GDPR Article 6 (1) (a) ‘the data subject has given consent to the processing of his or her personal data for one or more specific purposes’ |
Market research with schools | GDPR Article 6 (1) (f) ‘processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interest are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of the personal data’.
If focus groups are recorded, we will need your consent under GDPR Article 6 (1) (a)

One-off notifications / expressions of interest | GDPR Article 6 (1) (a) ‘the data subject has given consent to the processing of his or her personal data for one or more specific purposes’

Event management and organisation | GDPR Article 6 (1) (f) ‘processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interest are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of the personal data’.
When we collect any information about dietary or access requirements we also need your consent (under article 9 (2) (a)) as this type of information is classed as special category data.

Social media, email and website interaction monitoring | GDPR Article 6 (1) (f) ‘processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interest are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of the personal data’

School Leader Panel | GDPR Article 6 (1) (a) ‘the data subject has given consent to the processing of his or her personal data for one or more specific purposes’

When we rely on legitimate interest as our legal basis we have carried out a legitimate interest assessment. The assessment demonstrates that our research fulfils one of NFER’s core business purposes (normally developing products and services to improve learner outcomes). It has broader societal benefits as it contribute to meeting NFER’s mission to generate evidence and insights that can be used to improve outcomes for future generations everywhere, and to support positive change across education systems. The research cannot be done without processing personal data, but processing does not override the data subject's interests. To mitigate the risks to the rights and freedoms of the individual data subjects as far as possible, NFER has put in place the technical and organisational measures set out in this privacy notice.
4 Who will the personal data be shared with?

NFER only uses your personal information for the purpose for which it was provided. We only share data for a specific purpose which we have informed you about.

We use a third party provider, Dotdigital, to manage our regular e-newsletters and stakeholder communications.

Occasionally we use a third party to conduct research, including focus groups and survey questionnaires. For example we use Public Perspectives Ltd to carry out our annual stakeholder survey and Schoolzone or The Education Company for market research with schools. Any data sharing with them will be done via a secure portal and password protected.

We use Eventbrite, a ticketing and registration platform, to help us administer sign up to specific events. Further information on how data is stored and retained is set out on Eventbrite’s privacy policy.

We use Cisco WebEx to provide real-time online events and webinars and to help manage registration to these events. How Cisco WebEx collect, use, and process customer information is set out in the Cisco Privacy Statement. The Cisco WebEx Terms of Service provides additional information.

We may use a third party for photography and filming of our events. Details are available on request.

We use a number of third party social media monitoring tools. From time to time we may also use third party organisations to support us with this work. Details are available on request.

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

We use a number of internationally available pieces of third party software to help us provide and monitor our marketing and information communications; some of them are located outside of the European Economic Area. In all cases, such transfer only takes place under the appropriate safeguards and is in accordance with data protection laws. Details are available on request.

6 How long will personal data be retained?

Data is not kept longer than is necessary and is deleted in accordance with NFER’s internal policy. Where this differs for individual marketing and communication activities, this is listed below:

<table>
<thead>
<tr>
<th>Activity</th>
<th>How long will personal data be retained?</th>
</tr>
</thead>
</table>

Last updated: 1/12/2022

Public
<table>
<thead>
<tr>
<th>Stakeholder communications (including annual stakeholder survey)</th>
<th>Stakeholder information is retained until you ask us to stop sending you these communications. If you ask to be removed from our communications list, we retain your name and e-mail address on the system to ensure that we do not contact you again.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stakeholder Survey</td>
<td>Data is retained for 3 months from date of project completion.</td>
</tr>
<tr>
<td>Newsletters</td>
<td>Personal information is held on our systems from date of sign up; for as long as is necessary to deliver the service or until the publication is withdrawn or you choose to unsubscribe.</td>
</tr>
<tr>
<td>One-off notifications / expressions of interest</td>
<td>Personal data is deleted once you have been notified of a publication or received further details of the research you had enquired about.</td>
</tr>
</tbody>
</table>
| Events | For both in person and online events:  
Attendance data and additional personal data (such as dietary, access or other) provided for a specific event is retained for 1 month from the date of the event.  
Attendance data for a specific project is kept until the end of a project and individual projects will have their own privacy notice which details the retention schedule.  
Photos, filming and recordings will be reviewed annually and retained for as long as required. |
| Market research with schools | Third parties are required to delete personal data within three months of collection, and NFER will only retain personal data related to market research for a maximum of six months unless specifically stated otherwise. |
| Social media, email and website interaction monitoring | Information on social media interactions is retained for as long as necessary to ensure that NFER research, products and services are communicated to as wide an audience as possible. |
| School Leader Panel | School leaders sign up to be part of the panel for a year at a time. Every year we contact them to ask if they still wish to be a panel member. |
7  Can I stop my personal data being used?

NFER handles your personal data in accordance with the rights given to individuals under data protection legislation. If at any time you wish us to withdraw your data or correct errors in it, please contact the Sales, Marketing and Impact team.

In certain circumstances, data subjects have the right to restrict or object to processing. They also have the right to make a subject access request to see all the information held about them. To exercise any of these rights, please contact our Compliance Officer.

8  Who can I contact about this project?

Any queries about NFER’s stakeholder communications, please contact the Sales, Marketing and Impact team.

If you have a concern about the way NFER processes personal data, we request that you raise your concern with us in the first instance (see details above). If you remain 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/.

9  Updates

We keep this privacy notice under review to make sure it is up to date and accurate. Any changes will be noted. The date when this privacy notice was last updated is shown in the footer at the bottom of this document.

This privacy notice was updated:

- in December 2021 to clarify what social media, email and website interaction monitoring entails.
- in December 2022 to reflect NFER’s market research activities with schools.