

# Improving learner outcomes in GCSE resits in English and maths: privacy notice for college staff

The purpose of this document is to explain what personal information (data) will be collected from research participants as part of this 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 a research project, funded by the Education Endowment Foundation (EEF), to understand the diversity in colleges' practices in relation to GCSE resit provision and to examine how differences in colleges' practices relate to differences in their students' GCSE resit outcomes. The project will provide both exploratory and causal evidence to assess the impact of increased classroom teaching hours – triggered by new government expectations and funding regulations – on the proportion of learners achieving a grade 4 or above in their maths and/or English resits.

The scoping phase of the project, which is covered by the privacy notice, will run from April 2025 to January 2026. It will involve analysis of National Pupil Database (NPD) and Individualised Learner Record (ILR) data, development of a theory of change, a large-scale survey of further education colleges, and qualitative interviews with college staff. The project will be guided by a study advisory group, which will be convened and managed by the EEF.

The findings from the scoping phase of the study will be published in a final report. If at the end of the scoping phase, the EEF determines that, based on the findings from the scoping phase, an impact evaluation is likely to be feasible, then the project will proceed to an impact evaluation. A separate privacy notice covering this phase of the project will then be produced.

For the purposes of data protection legislation, NFER is the data controller, meaning NFER is responsible for deciding how any personal data is used.

Further information about the project can be found on our information sheet, which is available from our [website](#).

## 2 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). The research has broader societal benefits, and the project will provide new insights into how colleges are adapting to new Department for Education funding rules that mandate minimum teaching hours for GCSE resit students. It cannot be done without processing personal data, but processing does not override the data subject’s interests.

### 3 How will personal data be obtained?

NFER will collect personal data from college staff using two approaches, summarised below.

1. Exploratory interviews with up to two staff in each of six colleges. For each college, we plan to speak to:
  - a Curriculum Director or an appropriate senior leader who has oversight for GCSE resit delivery and outcomes
  - a senior course leader for English and/or maths GCSE resits.
2. An online survey of colleges, which is likely to involve data managers, Curriculum Directors and Heads of Maths and English. The privacy notice for the survey platform can be found here: <https://www.tivian.com/uk/privacy-policy-2/>.

We will use publicly available college email addresses together with web searches to contact colleges and invite them to participate in the research. For the exploratory interviews, we will ask the college representatives to identify the relevant staff to speak to. We anticipate that colleges will either set up the staff interviews on our behalf or pass on the staff contact details (e.g., name, email address and telephone number) for NFER researchers to contact the relevant people directly.

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

For each of the two data collection methods, we plan to collect the following information from college staff.

#### Exploratory interviews

- Views on the impact of government targets on minimum teaching hours.
- Views on any challenges faced because of the new requirements.
- Views on the importance of staff experience and qualifications when selecting staff to teach GCSE resit classes.
- Views on how other factors, such as class size and student attendance and engagement, might affect resit outcomes.
- Views on how we can encourage participation in the survey, including who to contact, what types of questions we should ask, and what level of financial incentive we should be offering.

## Survey of colleges

- Views on the impact of government targets on minimum teaching hours.
- Views on any challenges faced because of the new requirements.
- Views on the importance of staff experience and qualifications when selecting staff to teach GCSE resit classes.
- Views on how other factors, such as class size and student attendance and engagement, might affect resit outcomes.

To support response rates, research participants will be offered a financial payment to thank them for their time. In order to process these payments, it may be necessary to collect their name, email address, and bank details.

## 5 Who will personal data be shared with?

All interviews will be undertaken remotely by telephone or Microsoft Teams. The privacy notice for Microsoft Teams can be found here: <https://docs.microsoft.com/en-us/microsoftteams/teams-privacy>. The online survey data is collected via Tivian which stores survey responses in Azure and AWS data centre infrastructure in the European Union. Tivian's privacy notice is available here: <https://www.tivian.com/uk/privacy-policy-2/>.

The interviews will 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 research participants' permission to record will be asked at the start of the interview.

As part of this project, survey data will be linked to data on the students from those same colleges in the NPD and ILR data. This will allow us to examine whether there are any relationships between institutions' approaches to GCSE resits (as indicated by the survey responses) and resit outcomes (as recorded in the NPD/ILR).

Within three months of the project's conclusion, NFER will transfer the linked dataset to EEF's data archive partner via a secure, password-protected portal. If the project proceeds to an impact evaluation, this will happen at the end of the impact evaluation, rather than at the end of the scoping stage. This dataset will be pseudonymised, with direct identifiers (such as college names) replaced by numeric codes. No information from the staff interviews will be archived, and the pseudonymised survey data will not include any personal data.

At this point, EEF's data archive partner will retain a copy of the data, and EEF will assume the role of Data Controller. This process aligns with NFER's commitment to open science and the advancement of research methods.

No participating individuals or colleges will be named in our reports.

## 6 Is personal data being transferred outside of the United Kingdom (UK)?

NFER only stores personal data in the UK.

The online survey data collected via Tivian stores survey responses in the European Union.

## 7 How long will personal data be retained?

NFER will retain personal data for up to 12 months after the publication of the project's final report.

If, at the end of the scoping phase, the EEF determines that an impact evaluation is not feasible, then a final report will be published in January 2026, and all personal data will be deleted no later than January 2027. Alternatively, if the EEF decides the project can proceed to an impact evaluation, the final report will be published in September 2026, and all personal data will be deleted no later than September 2027. In either case, interview recordings will be deleted once they have been analysed.

## 8 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 Matt Walker ([m.walker@nfer.ac.uk](mailto:m.walker@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](mailto:compliance@nfer.ac.uk)).

## 9 Who can I contact about this project?

NFER is responsible for the day-to-day management of this evaluation. Contact the Project Leader Matt Walker ([m.walker@nfer.ac.uk](mailto:m.walker@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/>.

## 10 Last updated

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