

# 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) and [ICF](#) are collecting personal data as part of two separate, but closely related research projects, funded by the Education Endowment Foundation (EEF). These projects aim to provide both exploratory and causal evidence to assess how the number of hours allocated to teaching GCSE resits may affect student outcomes, and to determine the optimal timing for students to resit their exams. The surveys have been combined to reduce the burden on participants.

The scoping phase of the projects, which is covered by the privacy notice, will run from April 2025 to spring 2026. This will involve analysis of National Pupil Database (NPD) and Individualised Learner Record (ILR) data, a large-scale survey of further education colleges, and qualitative interviews with college staff. Both projects 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 studies will be published in two separate final reports. 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 projects will proceed to an impact evaluation. A new privacy notice will then be created to cover that phase of the project(s).

For the purposes of data protection legislation, NFER and ICF are independent Data Controllers making decisions about how personal data is processed for each separate study.

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

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

For both studies, 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’.

NFER and ICF have carried out a legitimate interest assessment, which demonstrates that both projects fulfil one of their core business purposes (undertaking research, evaluation and information activities). The research has broader societal benefits, and the projects 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 and ICF will collect personal data from college staff using two approaches, summarised below. Data will be shared between NFER and ICF from the second approach (the online survey) but not the first approach (exploratory interviews).

1. Exploratory interviews with up to two staff in each of the 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.

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

- Interviewee names, roles and contact details
- 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**

- Respondents' name, role in their college and email address
- Data on the teaching hours each college has offered to both English and maths GCSE resit students going back to at least 2021-22, and 2017-18 where possible.
- Additional costs, if any, that each college incurred as a result of increasing teaching hours for GCSE English and/or maths resits, where applicable.
- Views on the impact of government targets on minimum teaching hours.
- Views on the reasons for entering or not entering students for November resits.
- 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.

Partial or incomplete survey responses may be collected and processed for research purposes and will be handled in accordance with the same confidentiality, security, and data protection measures as complete responses. To support response rates, research participants who complete the survey will be offered a financial payment to thank them for their time. In order to process these payments, we will ask respondents for their name, role and email address. We will also ask if respondents are happy for their contact details to be used to send them a copy of their final report, and to inform them about future research opportunities.

## **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 both projects, 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).

NFER will be responsible for administering the survey and will securely transfer selected data to ICF once the survey has closed. This will include responses to selected questions from the FE college survey, along with college identifiers. Where the necessary permissions have been granted, contact details (name, role and email address) of respondents who completed the survey will also be shared, to inform them about future research opportunities, including the impact evaluation phase of the projects they will have participated in, as well as other projects relating to post-16 setting choices.

Within three months of the project's conclusion, NFER and ICF will transfer the linked datasets to EEF's data archive partner via a secure, password-protected portal. If the projects proceed 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.

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 and ICF only store personal data in the UK.

The online survey data collected via Tivian which stores survey responses in Azure and AWS data centre infrastructure in the European Union.

## 7 How long will personal data be retained?

NFER and ICF will retain personal data for up to 12 months after the publication of their respective project's final reports.

If, at the end of the scoping phase, the EEF determines that the impact evaluations are not feasible, then the final reports will be published in spring 2026, and all personal data will be deleted no later than spring 2027. Alternatively, if the EEF decides the projects can proceed to an impact evaluation, the final reports will be published in autumn 2026, and all personal data will be deleted no later than autumn 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

NFER is responsible for the day-to-day management of data collection activities. If at any time you wish to exercise any of these rights and/or withdraw your data from the project, please contact [GCSEresits@nfer.ac.uk](mailto:GCSEresits@nfer.ac.uk).

## 9 Who can I contact about this project?

You can contact either NFER, or ICF, with any queries about the processing of personal data. For NFER contact NFER's Compliance Officer ([compliance@nfer.ac.uk](mailto:compliance@nfer.ac.uk)). For ICF, please contact Geraldine Henbest, Vice President and Data Protection Officer ([dataprotection@icf.com](mailto:dataprotection@icf.com)).

If you have a concern about the way either project processes personal data, we request that you raise your concern with NFER or ICF 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

The privacy notice was updated in September 2025 to reflect the collaboration between NFER and ICF in developing and administering a single survey of FE colleges.