
Privacy Notice for Evaluation of Ruth Miskin Training: Read Write Inc. Phonics Programme

1 Why are we collecting this data?

The National Foundation for Educational Research (NFER) is collecting personal data to enable the evaluation of the Ruth Miskin Training: *Read Write Inc. (RWI) Phonics* programme. This is an initiative in schools funded by the Department for Education's Teaching and Leadership Innovation Fund (TLIF). The evaluation is funded by the Education Endowment Foundation, who have appointed the National Foundation for Educational Research to conduct the evaluation. The main aim of the RWI programme is to improve literacy outcomes for Reception and Key Stage 1 children, through a programme of phonics and early reading CPD, teaching resources and in-school support.

NFER and Ruth Miskin Training are the joint Data Controllers for this research.

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:

Legitimate interests: the processing is necessary for your (or a third party's) legitimate interests unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

NFER and Ruth Miskin Training have undertaken a legitimate interest assessment. We cannot undertake the evaluation without processing personal data. Both organisations have identified that the processing is in its legitimate interests; for NFER it fulfils a core business purpose and for Ruth Miskin Training the outcomes will be used to improve its activities and children's learning. There are also broader societal benefits as it will provide important evidence on effective literacy teaching and the processing but the processing does not override the data subject's interests..

A separate legal basis must be identified for processing special data. The legal basis for processing special data for the evaluation of TP is GDPR Article 9 (2) (j) which states:

Archiving, research and statistics (with a basis in law): processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with [Article 89\(1\)](#) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and

provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

We do not believe this processing will cause damage or distress to the data subjects. The outcomes if the evaluation will not result in the creation of measures or decisions being made about any participating pupil.

3 How will personal data be obtained?

Ruth Miskin Training has recruited schools to the project and, through this process, collected personal data regarding the participating schools and teaching staff. Ruth Miskin Training's data collection is supported by a separate Privacy Notice, covering all Teaching and Leadership Innovation Fund (TLIF) projects. You will find this document [here](#).

Personal data will be collected by NFER directly from schools.

4 What personal data is being collected by this project?

Ruth Miskin Training will share the name, role and email address of participating teachers. NFER will gather other data from teachers about their views on the teaching of the Read Write Inc. Phonics programme and Ruth Miskin Training's CPD through online surveys and telephone interviews.

Teacher's views of the programme will be collected via an online survey; the survey is hosted and delivered by our third party provider, Questback. You can find their privacy notice here: <https://www.questback.com/data-privacy/>

For each participating pupil, NFER will collect name, gender, date of birth, UPN, Free School Meal status, ethnicity*, whether a pupil has special educational needs, school start date, class name and school name from their school.

NFER will also collect pupil assessment outcomes from schools in 2021. The outcomes will be matched to the above pupil data. This assessment data will consist of pupil results from the Year 1 Phonics Screening Check, the Key Stage 1 reading outcomes for 2021 and pupil results from the Year 2 Phonics Screening Check in December 2020.

The above datasets will enable NFER to undertake primary and secondary outcomes analyses for the research.

*considered as special category data

5 Who will personal data be shared with?

At the end of the evaluation, pupil data will be archived. NFER will share pseudonymised pupil data with EEF. The EEF archive is managed by FFT on behalf of EEF and hosted by the ONS. At this point EEF becomes the data controller. This will enable the EEF and other research teams to use the pseudonymised data as part of subsequent research through the ONS Approved Researcher Scheme. The Approved Researcher Scheme is used by the ONS to grant secure access to data that cannot be published openly, for statistical research purposes, as permitted by the Statistics and Registration Service Act 2007 (SRSA). This may also involve linking the data to the National Pupil Database or other datasets.

Teachers' personal details and survey responses will be shared with the NFER team carrying out the overall evaluation of the Teaching and Leadership Innovation Fund, so that they can compare responses across projects being supported by the Fund. These details will not be shared with anyone else associated with the evaluation and all survey data will be anonymised in any reports.

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

No personal data is stored or transferred outside of the EEA.

7 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. At the latest data will be deleted by 31 December 2022.

8 Can I stop my personal data being used?

NFER handles 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 ruthmiskin@nfer.ac.uk.

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. NFER will cooperate fully when a subject access request (SAR) is made. To exercise these rights, please contact our Compliance Officer (compliance@nfer.ac.uk).

For more information about your rights with regard to your personal data, please refer to the ICO Website <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

9 Who can I contact about this project?

NFER is responsible for the day-to-day management of this project. Any queries please contact Claire Bradbury at ruthmiskin@nfer.ac.uk. Ruth Miskin Training can be contacted at admin@ruthmiskin.com.

If you have a concern about the way this project processes personal data, we request that you raise your concern with us or Ruth Miskin Training (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 Updates

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated on 21 October 2020.