

## Rich Retrieval pilot evaluation: Rich Retrieval school staff privacy notice

### 1 Why are we collecting this data?

The Education Endowment Foundation (EEF) has commissioned the National Foundation for Educational Research (NFER) to carry out a pilot evaluation of Bath Spa University's Rich Retrieval primary science programme. The Rich Retrieval programme provides professional development and curriculum resources to support primary science teachers. The aim of this programme is for pupils to build rich scientific concepts that are interconnected to form meaningful schemas of science topics. The pilot evaluation aims to observe how the programme runs, its feasibility, any early evidence of promise including initial signs of perceived impact, and potential for scaling/evaluating further in a randomized controlled trial. The pilot will take place over the course of the 2026-27 academic year.

This document outlines how school staff's personal data will be collected and processed for the purposes of the evaluation.

The Education Endowment Foundation (EEF) has funded this evaluation. For the evaluation, NFER is the independent data controller, and where relevant Bath Spa University are data processors. This means that NFER will determine the purposes of data processing for the evaluation and Bath Spa University will process relevant data on behalf of NFER.

Bath Spa University will also process data to deliver the Rich Retrieval programme. For this purpose, they are independent data controllers and are responsible for making decisions about how data is processed. Their privacy notice can be found here:

<https://www.bathspa.ac.uk/projects/rich-retrieval/>

No school, educator or pupil will be named in any report arising from this work, nor will we include any information that might mean that someone else could identify them.

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

The legal basis for processing personal data is covered by GDPR Article 6 (1) (f):

*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.*

A legitimate interest assessment has been undertaken. The evaluation fulfils one of NFER's core business purposes (undertaking research, evaluation, and information activities). It has broader societal benefits and will contribute to improving the lives of learners by providing evidence about professional development and teaching techniques in primary science. Research cannot be done without processing personal data, but NFER will ensure your rights are respected at all times.

### 3 How will personal data be obtained?

All personal data for the evaluation will be collected directly from participating teachers and schools.

Bath Spa University will collect data, and share it with NFER via a secure portal for the purposes of the evaluation:

- via the Memorandum of Understanding document, sent by email
- via an online pre-survey using Microsoft Forms
- via a session delivery document stored on Bath Spa University Sharepoint, shared with the participating teacher
- via an attendance register for each professional development session, collected during the session using Microsoft 365

NFER will ask all participating teachers to respond to an online survey at the end of the pilot, using Tivian (see Section 5 for Tivian Privacy Notice information).

Each school will be invited to participate in a school visit or online teacher interview. School visits will involve observation of a science lesson which uses Rich Retrieval, and interviews with a class teacher, science lead and senior leader.

Further personal data about teachers will be collected throughout the evaluation (see section 4 for full details).

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

Bath Spa University will collect the following data and share it with NFER:

- the full name and contact details of the headteacher in the MoU when a school signs up to participate in the project alongside the full name, contact details and job role for the key contact on the project, who will facilitate communications between the school and Bath Spa University, and the school and NFER

For participating teachers, Bath Spa will also collect the following data and share it with NFER:

- full name, contact details and role to facilitate contact throughout the evaluation
- teaching experience, context (e.g. year group and science topics) and prior experience of retrieval practice
- weekly session delivery data, comprising whether Rich Retrieval was used, the activity name, and time taken
- attendance data for Rich Retrieval professional development sessions

NFER will collect data from participating teachers on their experience and views on Rich Retrieval professional development and resources, use of Rich Retrieval and perceived impacts for teachers and pupils.

For senior leaders and science leads whose school is selected for a visit, in addition to the personal data listed above, we will collect their views about Rich Retrieval, school-level support for the programme and school priorities for teaching and learning in science.

## 5 Who will personal data be shared with?

Personal data collected by Bath Spa University which is needed for the evaluation will be shared with NFER securely. Where NFER collects any updated contact details for participating teachers, these will be shared with Bath Spa University to facilitate contact. No other personal data collected by NFER through school visits, online interviews, or the online survey will be shared with Bath Spa University.

The NFER online survey data is collected via Tivian which stores names, contact details and survey responses in Azure and AWS data centre infrastructure in the European Union (EU). Tivian's privacy notice is available here: <https://www.tivian.com/uk/privacy-policy-2/>

We will use Microsoft Bookings to set up online teacher interviews, and Microsoft Teams to conduct, record and transcribe the interviews. A privacy notice for Microsoft can be found at <https://www.microsoft.com/en-gb/privacy/privacystatement>. A privacy notice for Microsoft Teams can be found at <https://learn.microsoft.com/en-us/microsoftteams/security-compliance-overview#privacy>

No individual will be named in any report for this project.

## 6 Is personal data being transferred outside of the UK?

When NFER use Tivian to administer online surveys, data is stored in the EU.

Only personal data required for, and collected as part of, the online surveys (names, contact details and survey responses) will be stored outside of the UK.

## 7 How long will personal data be retained?

NFER will delete any personal data collected as part of the evaluation within one year of publication of the final report (due to be published in March 2028). This deletion process is currently planned for March 2029.

## 8 What are my rights with respect to personal data?

NFER handles personal data in accordance with the rights given to individuals under data protection legislation. Under certain circumstances data subjects have the right:

- to request access to information that is held about them (a data subject access request).
- to have 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 processing of personal data (for example, permitting its storage but no further processing).
- to object to processing
- to data portability
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect.

To exercise any of these rights please contact us (see section 9). We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This helps us ensure that personal information is not disclosed to any person who has no right to receive it.

Although we value your participation in this evaluation and its contribution to important findings, you can withdraw from the evaluation activities at any time. If you withdraw, unless otherwise instructed, we will use any data we have collected up to that point in our analysis. Please note that withdrawing your data will not be possible once data analysis has commenced (from March 2027 for interviews and school visits, and June 2027 for the teacher survey). If at any time you wish to withdraw from the evaluation activities, or withdraw your data or correct errors in it, please contact: [richretrieval@nfer.ac.uk](mailto:richretrieval@nfer.ac.uk)

## 9 Who can I contact about this project?

Any queries about the day-to-day management of the data processing outlined in this privacy notice, please contact the project team at [richretrieval@nfer.ac.uk](mailto:richretrieval@nfer.ac.uk)

If you have any questions about the way NFER processes personal data, please contact the Compliance Officer using the email address provided above, or you can make a complaint as outlined in our [Complaints Policy](#).

After we have responded, if you remain dissatisfied, you have the right to raise a complaint about data protection issues with 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 keep this privacy notice under review to make sure it is up to date and accurate. Any changes will be noted. We recommend that you revisit this information from time to time. The date when this privacy notice was last updated is shown in the footer at the bottom of this document.

The privacy notice was updated in July 2026 to clarify which data from participating teachers will be collected directly by NFER, and in August 2026 to include NFER's data protection complaints policy.