

## School Choices Scoping – Homework Clubs

### Privacy Notice for School Staff

#### 1 Why are we collecting this data?

The Education Endowment Foundation (EEF) has commissioned the NFER to conduct a research project to explore the nature of homework club provision and other homework support in English secondary schools. This project is being co-funded by the EEF and XTX Markets, and will take place between September 2025 and February 2026.

The findings from this research project will be published in a report. Based on these findings, the EEF will decide whether to commission an extension of this research project to look into the impact of homework clubs on pupil attainment. Data collected as part of the initial research may be subsequently used in an additional report for the extension. A separate privacy notice will be written if an extension is commissioned, to cover additional data collection.

NFER is the data controller and will make decisions about how and what personal data is used for the research and will process data to deliver the project.

This privacy notice covers staff data collected for the purpose of this research.

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

The legal basis for processing personal data is covered by:

Article 6 1 (f) Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party, 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. It demonstrates that it is within NFER's interests in undertaking this research to collect and analyse data on schools' use of homework clubs and other forms of homework support. The research 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 schools' homework policies and support, in order to inform school practice. The research cannot be done without processing personal data, but processing does not override the data subject's interests.

#### 3 How will personal data be obtained?

Personal data will be collected:

- **Directly from staff in participating schools, via an online survey**
- **From publicly available information on school websites**

We will use a web scraping tool to collect brief text snippets from school websites about homework club provision. In a small proportion of cases, this could include staff names or contact details (work email, work telephone number) where these are already publicly shared on the website. To reduce the amount of personal data we collect, we will use a tool to identify and delete any personal data it is able to identify automatically, prior to storage and analysis of the dataset.

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

The following personal data will be collected from surveyed school staff:

- email address and job role/title.

The survey will collect information from school staff about their school's homework practice including description of homework, homework support and homework clubs.

Within the survey, respondents will be asked if they are willing to be contacted about participating in a short remote interview about homework practice in their school, as part of the potential extension of the research. If an extension to the research is commissioned, we will provide a new Privacy Notice when re-contacting respondents about an interview.

If your school is successful in the prize draw, payment will be made by bank transfer, we will additionally require the details (as listed above) of a contact in the school's finance department to facilitate the payment. This additional data will be treated in line with this privacy notice.

## 5 Who will personal data be shared with?

The online survey data is collected via Tivian. Tivian's privacy notice is available [here](#).

Text about home club provision will be analysed using an AI tool. If any personal data has not been identified and removed by the webscraping tool, this will be shared with the tool. Any data uploaded to the tool for analysis will remain within NFER's account (that is not used to train the model).

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

NFER only stores 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?

Where staff do not agree to being contacted about a further interview, their contact details will be deleted in January 2026, following the administration of thank you vouchers and the survey prize draw.

Contact details for staff who agree to be contacted about a follow-up interview, and any personal data from web scraping, will be stored for up to 12 months after the publication of the project's final report. This means there are two potential retention periods for personal data processed for this study:

- If, at the end of the scoping phase, the EEF determines that an extension to the research is not feasible, then a final report will be published in summer 2026, and all personal data will be deleted no later than May 2027.
- If the EEF decides the project can proceed to an impact evaluation, the final report will be published in summer 2027, and all personal data will be deleted no later than August 2028.

## 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. 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.

Although we value your participation you can withdraw from the project survey or web scraping 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 reporting has commenced (from December 2025). If at any time you wish to withdraw your data or correct errors in it, please contact:

[homeworkresearch@nfer.ac.uk](mailto:homeworkresearch@nfer.ac.uk).

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.

To exercise any of these rights, please contact the NFER's Compliance Officer at [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 the research. Please contact the research team at: [homeworkresearch@nfer.ac.uk](mailto:homeworkresearch@nfer.ac.uk)

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 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/>.

Further information on this project can be found [here](#).

## 10 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.