
Privacy Notice for the evaluation of The Duke of Edinburgh's Award (DofE)

1 Why are we collecting this data?

The Duke of Edinburgh's Award (DofE) has commissioned the National Foundation for Educational Research (NFER) to carry out an evaluation of Bronze DofE programmes. The aim of the project is to assess whether or not young people who did their Bronze DofE achieved better GCSE results compared to similar young people in similar schools who did not participate in DofE.

To undertake this research, NFER will analyse educational outcomes and personal characteristics from the Department for Education's National Pupil Database (NPD).

The DofE, the data controller, has contacted participants to ask for their consent to use their names, addresses and name of the school they attended. The DofE is the data controller of this information and is responsible for determining how personal data is used, collected and handled during and following the research. Any published research that arises from this project will be aggregated, and no individual school or pupil will be identified in the data.

NFER, as data processor for the evaluation of Bronze DofE programmes, is responsible for securely storing and handling any personal data.

This privacy notice covers only NFER's current evaluation. If, as mentioned in your invitation email, the DofE commissions further research to look at employment outcomes, updated privacy information will be provided.

NFER will access educational outcomes and personal characteristic data from the NPD for the 2019 GCSE cohort of pupils (which includes the consenting DofE participants). DofE is the data controller for this data, with NFER as data processor, under a contract. We will access de-identified data for non-participants for the purpose of assessing the impact, by comparing their GCSE achievement to that of consenting participants.

2 What is the legal basis for processing activities?

The legal basis for processing personal data is covered by:

- GDPR Article 6 (1) (a) which states that the individual has given clear consent for NFER to process their personal data such as their names, date of birth and school attended for the evaluation of Bronze DofE programmes.

The legal basis for processing special personal data is covered by:

- GDPR Article 9 (2) (a) which states that the individual has given clear consent for NFER to process their personal data such as special educational needs status.

The legal basis for processing personal NPD data is covered by:

GDPR Article 6 (1) (f): 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.

The legal basis for processing special personal NPD data is covered by:

GDPR Article 9 (2) (j): 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 right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

3 How will personal data be obtained?

The DofE will write to achievers of a Bronze DofE Award, asking for their consent to share their personal data (name, date of birth and school attended) with NFER for the purposes of evaluating Bronze DofE programmes. A list of participants who agree to participate in the research will be provided to NFER, and shared with the Department for Education to match to records on educational attainment and individual characteristics.

NFER will also access educational outcomes and personal characteristic data from the NPD for the 2019 GCSE cohort of pupils, by applying to the Department for Education for access to this data.

4 What personal data is being collected by this project?

NFER will collect and/or process the following data:

- Consenting participants' names, dates of birth, and the school they attended. These will be used only for the purpose of identifying individuals and linking to their records in the NPD.
- Data on educational attainment and personal characteristics from the Department for Education's NPD, for all pupils in the 2019 GCSE cohort (including consenting participants).

Ethnicity, special education needs and free school meal status are examples of main personal characteristics to be collected.

NFER's analysis and reporting will use de-identified records and will not identify any individual or school in any published reports arising from the research.

5 Who will personal data be shared with?

Personal data will be shared with NFER and with the Department for Education, for the purpose of data linking. Analysis of personal data will be undertaken within the Office for National Statistics Secure Research Service (SRS) system. No personal data will be extracted from the SRS. We will not use your name or the name of your school in any report from the research. Is personal data being transferred outside of the European Economic Areas (EEA)?

Personal data gathered for this project will not be transferred outside of the EEA.

6 How long will personal data for this project be retained?

NFER (the data processor) will securely dispose of the data at the end of the project, which is expected to be in December 2020. At that point, personal data will also be permanently deleted from the SRS ONS system.

The DofE will, unless withdrawn in the intervening period, maintain records of your consent to check on your future employment until December 2029.

7 Can I stop my personal data being used?

The DofE and 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 consent of our process of activities please contact the DofE at communications@DofE.org. To correct errors in the data, please contact Jack Worth at NFER (email address: j.worth@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 of a data controller. To exercise these rights, please contact NFER's Compliance Officer (compliance@nfer.ac.uk).

8 Who can I contact about this project?

NFER is responsible for the day-to-day management of this project. Contact Jack Worth (email address: j.worth@nfer.ac.uk) with any queries.

The Duke of Edinburgh's Award determines the purposes and means of processing personal data as part of this project. Their Data Protection Officer can be contacted at: Director of UK Services, The Duke of Edinburgh's Award, Gulliver House Madeira Walk, Windsor SL4 1EU

If you have a concern about the way this project processes personal data, we request that you raise your concern with us or the DofE in the first instance (see the details above). Alternatively,

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/>.

9 Updates

We may need to update this privacy notice periodically so 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.